

EXHIBIT 5

Redacted for PII

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4

5 Civil Action No. 1:17-cv-02989-AT
6

7 _____
8 DONNA CURLING, et al.,

9 Plaintiffs,

10 vs.

11 BRAD RAFFENSPERGER, et al.,

12 Defendants.
13 _____

14 VIDEOTAPED DEPOSITION OF
15 JIL RIDLEHOOVER
16

17 Tuesday, August 16, 2022
18

19 Court Reporters:

20 LeShaundra Byrd (9:43 a.m. to 10:18 a.m.)

21 Felicia A. Newland, CSR (10:18 a.m. to 12:56 p.m.)
22

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Bryan Tyson

Caroline Middleton

Bruce Brown

Ernestine Thomas-Clark

Kevin Skoglund

Marilyn Marks

Oluwasegun Joseph

Clint Lott

Videographer: Scott Bridwell

C O N T E N T S

EXAMINATION BY: PAGE

Counsel for Plaintiffs 8

Counsel for State of Georgia 178

RIDLEHOOVER DEPOSITION EXHIBITS

NO. DESCRIPTION PAGE

1 DouglasNow news article, Re: Hampton & 66

Ridlehoover resignation

2 Ridlehoover Subpoena 69

3 Jil screenshot at 5.19 of Video 2 74

4 Dominion Voting Machine Flaws -- 2020 78

Election Coffee County, Georgia, Video 2

screenshot

5 Screenshot 2 (sportcoat) 82

6 Screenshot of Scott Hall 83

7 Screenshot of Jennifer Jackson 86

8 Screenshot of Paul Maggio 91

9 Screenshot of Doug Logan 92

10 Screenshot of Greg Freemyer 93

11 Screenshot of Russ Ramsland 94

12 Screenshot of Jeffrey Lenberg 94

13 Screenshot 3 95

1	14	E-mail string, From: Frances Watson to	103
2		Pamela Jones, dated May 11, 2021	
3	15	Election Database Memo re: Passwords	106
4	16	Misty Hampton messages - Eric Chaney	120
5	17	Text messages	152
6	18	Texts Reveal GOP Mission to Breach	162
7		Voting Machine in Georgia - Daily Beast	
8		*(Exhibits attached to transcript.)	

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P R O C E E D I N G S

* * * * *

(Whereupon, the following proceedings on
pages 6 through 46 were electronically
recorded and stenographically transcribed
by Felicia A. Newland, CSR.)

VIDEOGRAPHER: Good morning. We're
going on the record at 9:43 a.m., Tuesday,
August 16, 2022. Please note that the microphones
are sensitive and may pick up whispering, private
conversations, and cellular interference.

Please turn off all cellphones and
place them away from the microphones as they can
interfere with deposition audio.

Audio and video recording will
continue to take place unless all parties agree
to go off the record.

This is Media Unit 1 of the
video-recording of Jil Ridlehoover, taken before
counsel for Plaintiff in the matter of Donna
Curling, et al. versus Brad Raffensperger, et

1 al., filed in the United States District Court in
2 the Northern district of Georgia, Case Number
3 117-cv-0298918.

4 This deposition is being held at
5 the Fairfield Inn & Suites by Marriott Douglas,
6 located at 1815 Peterson Avenue South, Douglas.

7 My name is Scott Bridwell, from the
8 firm Veritext Legal Solutions. I am the
9 videographer. The court report is LeShaundra
10 Byrd, from the firm Veritext Legal Solutions.

11 I am not authorized to administer
12 an oath, I am related to any party in this
13 action, nor am I financially interested in the
14 outcome.

15 Counsel and all present in the
16 room, and everyone attending remotely, will now
17 state their appearance and affiliations for the
18 record.

19 MR. CROSS: David Cross, of Morrison
20 & Foerster, on behalf of the Curling Plaintiffs.
21 And with me is my colleague, Jenna Conaway.

22 MR. LOTT: Clint Lott on behalf of

1 Jil Ridlehoover.

2 MR. DELK: Stephen Delk.

3 COURT REPORTER: Repeat again who you
4 are. I can barely hear you.

5 MR. LOTT: Clint Lott on behalf of
6 Jil Ridlehoover.

7 MR. DELK: Stephen Delk on behalf of
8 Jil Ridlehoover.

9 MR. PICO PRATS: Javier Pico Prats,
10 from Robbins Alloy Belinfante Littlefield law firm,
11 on behalf of the State defendants.

12 VIDEOGRAPHER: Thank you. We may --
13 with the court reporter -- Ms. Reporter, will you
14 please swear in the witness?

15 (Witness duly sworn.)

16 VIDEOGRAPHER: Thank you. We may
17 proceed.

18 * * * * *

19 Whereupon,

20 JIL RIDLEHOOVER
21 was called as a witness and, having been first duly
22 sworn, was examined and testified as follows:

1 EXAMINATION BY COUNSEL FOR PLAINTIFFS

2 BY MR. CROSS:

3 Q Good morning, Ms. Ridlehoover.

4 A Good morning.

5 Q Thank you for being here.

6 Have you been deposed before?

7 A No.

8 Q So let me just briefly kind of walk
9 through how this works. I'm sure you already know
10 this from your counsel, but just so we're all kind
11 of on the same page.

12 So I'm going to ask you questions
13 during the course of the day. There will probably
14 be at least one other question or maybe two. You
15 have to answer the question as I put it to you
16 unless your counsel instructs you not to answer,
17 which should only be a privilege issue if it comes
18 up.

19 A Yes.

20 Q Do you understand that?

21 A Yes.

22 Q Okay. If at any point I ask a

1 question and you don't understand it, feel free to
2 just tell me that.

3 A Okay.

4 Q We'll figure it out together.

5 If you need to take a break at any
6 point, that's absolutely fine, the only exception
7 is if there's a question pending, you need to
8 answer that question before the break.

9 A Okay.

10 Q Is there any reason you feel like you
11 can't testify truthfully and completely today?

12 A No.

13 Q Any medication or sickness or
14 anything that would affect your testimony?

15 A No.

16 Q All right. Can you state your full
17 name for the record again, please?

18 A Jil H. Ridlehoover.

19 Q And what's your full name?

20 A Jil Henderson Riley.

21 COURT REPORTER: I'm sorry?

22 MR. CROSS: What? I'm sorry, what's

1 wrong? LeShaundra, what's wrong?

2 COURT REPORTER: She said -- did you
3 say Handerson Riley?

4 THE WITNESS: Henderson.

5 MR. CROSS: Okay.

6 BY MR. CROSS:

7 Q I'm sorry. Where do you live?

8 A [REDACTED]

9 Q How long have you lived there?

10 COURT REPORTER: Can we just stop for
11 a second? I'm sorry. Can we go off the record? I
12 apologize.

13 VIDEOGRAPHER: We're going off the
14 record at 9:47.

15 (Recess from 9:47 a.m. to 9:50 a.m.)

16 VIDEOGRAPHER: Okay. We are on the
17 record again at 9:50.

18 BY MR. CROSS:

19 Q All right. Let's just start over,
20 Ms. Ridlehoover. You said your full name is Jil
21 Henderson Riley?

22 A Correct.

1 Q Okay. And so where do you live
2 again?

3 A [REDACTED]

4 Q Douglas, Georgia?

5 A Yes.

6 Q How long have you lived there?

7 A I have lived there 12 years.

8 Q And where did you live before that?

9 A [REDACTED].

10 Q Ambrose?

11 A Yes, Ambrose. It's a smaller
12 community out just -- right outside Ambrose -- I
13 mean Douglas.

14 Q Have you always lived in Georgia?

15 A Yes.

16 Q Okay. Did you graduate high school?

17 A Yes.

18 Q Did you go to any further formal
19 education after?

20 A No. I got married after high school.

21 Q Okay. Where do you currently work?

22 A Chaney Motors.

1 Q And is that -- you work with Eric
2 Chaney there?

3 A Yes.

4 Q Okay. Is he your boss?

5 A Yes.

6 Q How long have you worked at Chaney
7 Motors?

8 A Two years.

9 Q Since you left the Coffee County
10 Elections Office?

11 A Do what now?

12 Q Since you left the Coffee County
13 Elections Office?

14 A Correct.

15 Q Okay. And what's your role at Chaney
16 Motors?

17 A I answer the phone. I take payments.
18 Really -- don't really have a role.

19 Q Okay. Well, are you a receptionist
20 or are you --

21 A Well, yeah, I guess you can call me
22 that, receptionist, secretary, yeah.

1 Q And you say you take payments for
2 what?

3 A Car payments.

4 Q And is that -- do you do that online?
5 Do people come in person? Or both?

6 A They'll do it on the phone, online,
7 credit card, or they'll come in person.

8 Q Is there anything else you do there?

9 A Just normal office/secretary stuff,
10 you know, straighten up. You might have some, you
11 know, stuff to file.

12 Q Okay. Is there anyone you work for
13 beyond Eric Chaney?

14 A Well, his -- technically his momma
15 and daddy, all them.

16 Q So before that, you were employed in
17 the Coffee County Elections Office?

18 A Correct.

19 Q And how long were you in that
20 position?

21 A I want to say five years, I think. I
22 mean, five or six years. Honestly, I can't

1 remember.

2 Q Sure.

3 When you started that job, was Misty
4 Hampton already employed?

5 A Yes.

6 Q Okay. What were your
7 responsibilities in the Coffee County Election
8 Office?

9 A I registered people to vote. If
10 there was a deceased, I took them out of the
11 register. Changed the address. Answer the phone.
12 Filed the precinct -- you know, precinct card, the
13 card you filled out to register to vote, I filed
14 those. And advanced voting, that was on the other
15 side. You know, say you came in to vote, you get
16 credit for voting.

17 Q Anything else?

18 A That's it.

19 Q And was that sort of your typical
20 role throughout the five or six years you lived
21 there?

22 A Yes.

1 Q And one of the things I forgot to say
2 is make sure I finish a question before you answer,
3 and I'll let you answer, because if we talk over
4 each other --

5 A Okay. I'm sorry.

6 Q -- it's hard for the court
7 reporter -- that's fine.

8 Did you have an official title?

9 A Just assistant.

10 Q Okay. Assistant to the --

11 A The election supervisor.

12 Q -- election supervisor?

13 A Yes.

14 Q Okay. So you were --

15 A It --

16 Q You were --

17 COURT REPORTER: Again, please, one
18 at a time.

19 Assistant to? Just -- you were
20 talking over each other.

21 BY MR. CROSS:

22 Q Assistant to the election supervisor?

1 A Correct.

2 Q And that was Ms. Hampton?

3 A Correct.

4 Q Okay. And does she sometimes go by
5 Misty Martin?

6 A Yes. She was married there for a
7 short time.

8 Q And were you employed before that?
9 Before the Coffee County Elections
10 Office, did you have a job before that?

11 A No. I just had a baby, and I was
12 staying at home, being a mom.

13 Q Okay. In the Coffee County Election
14 Office during the day, was it typically just you
15 and Ms. Hampton?

16 A Yes.

17 Q And you were the only two employees
18 who physically worked in that office, right?

19 A Yes.

20 Q And do I understand it right, the way
21 the setup in the office is, is there's a door to
22 the parking lot. It comes in sort of a foyer and

1 there's a glass window and you sat behind that
2 window at a desk?

3 A Correct.

4 Q And so people came in and if they
5 needed help, it looks like there was a hole in that
6 window where they could talk to you?

7 A Correct.

8 Q And so you -- you are sort of the
9 first person they would see to get help with?

10 A Correct.

11 Q And then next to that window is a
12 door that came into the space where you sat?

13 A Correct.

14 Q And inside that space there was a
15 door to an office where Misty Hampton sat?

16 A Correct.

17 Q And there was a window in
18 Ms. Hampton's office?

19 A Correct.

20 Q And then there was a door from
21 Ms. Hampton's office into a room that you guys
22 called the GEMS room?

1 A Correct.

2 Q And that's where the election
3 management server was?

4 A Correct.

5 Q And also the ICC and central scanner?

6 A Yes.

7 Q And that was the same setup under the
8 original GEM system manned under the Dominion
9 system, right?

10 A Yes.

11 Q And where were the BMDs stored in
12 your office that were part of the Dominion system?

13 A Okay. Honestly I don't know the term
14 for all that, so you'll have to explain to me what
15 it looked like.

16 Q Okay. So you understand that the
17 Dominion voting system used today, when voters
18 vote, they vote on a touchscreen computer?

19 A Right, the touchscreen. Okay.

20 Q And have you heard of that called a
21 ballot marketing device, or "BMD"?

22 A Yes. I called it a touchscreen.

1 Q Okay.

2 COURT REPORTER: You called it what?

3 THE WITNESS: The touchscreen.

4 BY MR. CROSS:

5 Q Where were those stored in the
6 office?

7 A You had Misty's door, then you had
8 another door that stayed locked also. And they
9 were back in to what we would call, like -- we
10 called it the vault.

11 Q Okay. What else was in the vault?

12 A Supply baskets for, like, precincts,
13 like, their paperwork they had to have. Actually,
14 in the other locked vault, there was nothing in
15 there but that. But there was another room that
16 had, like, supplies in it.

17 Q Okay. So there was a room that you
18 called the vault and that's where the touchscreens
19 were?

20 A Correct.

21 Q And then there was another room that
22 had supplies?

1 A Yes. It was just, like, a little
2 open room that we put the -- the precinct baskets
3 in that we would -- I would fix, you know, for,
4 like, the people to come, like, it had pens,
5 markers, scissors, tape, stuff like that.

6 Q And then are you familiar with poll
7 pads that were used to check voters in?

8 A They were in there also.

9 Q When you say "there," was that --

10 A The vault.

11 Q The vault. Okay.

12 Were there memory cards that were
13 used with the voting machines?

14 A Locked in there also.

15 Q In the vault?

16 A Yes.

17 Q And there were flash drives that were
18 used with the systems sometimes, right, little jump
19 drives, thumb drives?

20 A I want to say it was like a card, if
21 I remember correctly.

22 Q The card is a memory card, almost

1 looks like a credit card, right?

2 A No. These --

3 Q Okay.

4 A -- were like -- I'm thinking of the
5 old system. Honestly, I do not remember.

6 Q Okay.

7 A I didn't -- I didn't mess with
8 anybody.

9 Q So when it was time for an election,
10 who was responsible for taking the equipment out of
11 the vault and setting it up?

12 A The Dominion tech came and did all of
13 that.

14 Q In the building there was a door to
15 another room where early voting took place, right?

16 A Yes.

17 Q And when there was going to be an
18 election, you were going to do early voting, was it
19 a Dominion tech who would come in and set all that
20 equipment up in the early voting room?

21 A Yes.

22 Q So that wasn't Coffee County

1 employees, you relied on Dominion for that?

2 A Yeah. It was a Dominion guy.

3 Honestly, I don't remember his name.

4 Q And then some of that voting
5 equipment would go out to precincts, right?

6 A Yes.

7 Q And who was responsible for taking
8 that equipment out to a precinct?

9 A We had a lady at one time, she set --
10 she would come in and set up the precincts. She
11 would set them up herself. And then people would
12 come and open the doors up and put their banners
13 out and . . .

14 Q So -- and I just want to walk through
15 a little bit. So you've got an election coming up,
16 you've got to get all the equipment to the
17 individual precincts where people are going to
18 vote, right?

19 A Uh-huh.

20 Q Is that right?

21 A Yes.

22 Q Okay.

1 A Sorry.

2 Q That's all right. You have to give a
3 "yes" or a "no."

4 A Oh, I'm sorry. Yes.

5 Q That's okay.

6 And do I remember right, there are
7 six voting precincts in Coffee County. Does that
8 sound right?

9 A Yes.

10 Q Okay.

11 A That's correct.

12 Q And so for that process you've to get
13 the touchscreens out of the vault. Who would
14 handle that?

15 A The tech did it the last time.

16 Q And the last time for you would have
17 been the January 2021 runoff?

18 A Correct.

19 Q Because you left in February of 2021?

20 A Right.

21 Q So for that election, just taking
22 that election for a moment, the Dominion tech came

1 in, went into the vault, pulled the MBD
2 touchscreens out. Is that right?

3 A Correct.

4 Q And then who took those from your
5 office to the six precincts?

6 A Honestly the last time, I do not
7 remember who set them up.

8 Q What about the November 2020
9 election, who took them?

10 A I honestly don't remember if it was
11 Mandy or not.

12 Q And who is Mandy?

13 A Mandy Harper. She is who the County
14 hired to set up the machines at all the precincts.

15 Q And what can you tell me about her?

16 A Nothing really. I mean, her husband
17 is Rex. I mean, that's all I know about her.

18 Q Rex?

19 A Yeah.

20 Q And they contracted with the County
21 to do the servers?

22 A She only did that one time. And I

1 want to say it was maybe the PPP. I could be wrong
2 about that because she couldn't handle it.

3 Q And PPP is the presidential primary?

4 A Yes.

5 Q Okay.

6 A Yeah, presidential primary.

7 Q And that -- you're talking about the
8 one in 2020, in June?

9 A Yes. I mean, like I said, I'm not --
10 I'm just -- I could not be accurate. I'm not
11 accurate about that. I'm just --

12 Q Okay.

13 A -- assuming it. I mean . . .

14 Q When you say that Mandy couldn't
15 handle it, what -- what do you mean?

16 A I guess lifting all the machines
17 and -- because you had extra shifts. You had the
18 touchscreen, you had the printer, and then you had
19 that big huge battery pack.

20 COURT REPORTER: He had the what?

21 THE WITNESS: Battery pack.

22

1 BY MR. CROSS:

2 Q So she was -- she was brought in to
3 set this up for one election and it was just too
4 much for her --

5 A Correct.

6 Q -- correct?

7 Okay. Did you know how she
8 transported the machines from your office to the
9 precincts?

10 A The County had those big huge cargo
11 trailers, a cargo trailer built to put them in.

12 Q And she towed that behind a vehicle?

13 A No. One of the County men did. I
14 don't remember who.

15 Q So for the election that she handled,
16 she shows up. And who -- who physically moved the
17 machines out of the vault into the trailer?

18 A She did.

19 Q And you guys had over a hundred
20 touchscreen machines, right?

21 A I honestly do not know.

22 Q And she moved all of those herself

1 into the trailer?

2 A To my knowledge, yes.

3 Q Okay. And then who drove the vehicle
4 with that trailer to the precinct?

5 A I do not remember.

6 Q Do you know -- was it your office
7 that hired her or was it the County Election Board
8 or who?

9 A I -- I don't know how she got hired.

10 Q Do you know whether, for example, a
11 background check was performed on her?

12 A I have no clue.

13 Q So she would leave with the machines
14 and take them off to the precincts?

15 A Correct.

16 Q And then is it your understanding
17 that she was the person who would physically set
18 them up at the precincts?

19 A Correct.

20 Q And was she also the person who
21 bought them back?

22 A Correct.

1 Q Was she -- she carried all of those
2 into the vault?

3 A Correct.

4 Q And at some point you guys replaced
5 her with someone else?

6 A Yes. But I honestly do not know who.

7 Q Was it a man or a woman?

8 A I do not remember.

9 Q You don't remember anything about the
10 person who replaced her?

11 A I do not.

12 Q The BMD touchscreens have -- are you
13 aware that they have seals on them?

14 A Yes.

15 Q And some of those seals are metal.
16 Is that right?

17 A You can get different types of seals.

18 Q That's metal or plastic?

19 A Uh-huh.

20 Q Yes?

21 A Yes. Sorry.

22 Q That's okay.

1 Were the -- when the BMDs were in the
2 vault, were they stored inside of a container or
3 did they just sit inside the vault?

4 A They were in -- I honestly do not
5 remember if they were in those black cases or not.
6 I honestly do not remember.

7 Q So they may have been in some kind of
8 case, they may have not, you just don't remember?

9 A I'm pretty sure they were in a case,
10 I just keep going back to the old system because I
11 know they were the big huge things with legs and
12 they were chained altogether.

13 Q And by the old system, you mean the
14 old GEM SRE system?

15 A Yes.

16 Q And those -- those were chained
17 together. But the touchscreens were not chained
18 together in the Dominion system?

19 A They were in -- I can't remember if
20 they were inside the things, but I know they had
21 the metal thing -- they're -- the little wire
22 thingy that hooked through and chained together.

1 Q And that was on the BMDs too?

2 A Yes.

3 Q Okay. When you guys were setting up
4 for an election, was there a process to check each
5 individual touchscreen to determine whether the
6 seals were all present?

7 A We -- I didn't do L&A at that point,
8 so I do not know.

9 Q By "L&A" you mean logic and accuracy
10 testing?

11 A Yes.

12 Q And so that's -- that's a little
13 something different from what I'm talking about.

14 On the individual touchscreens, do
15 you recall that there were supposed to be seals on
16 the touchscreens themselves?

17 A Oh, yes. There was, I bet you, 10,
18 12 seals on every one of them.

19 Q Okay. And was there a process in the
20 office before you handed those off to be set up in
21 the precinct to check to make sure every seal was
22 on every device?

1 A I did not do any of that.

2 Q Do you if anyone did that?

3 A I'm assuming Misty.

4 Q Why?

5 And when -- I don't want you to
6 speculate or assume anything --

7 A Right. I don't know.

8 Q That's fine. Anything you don't
9 know --

10 A I don't know.

11 Q -- just say you don't. Okay.

12 So you never saw, for example, Misty
13 Hampton, or anyone else, inspect those machines,
14 check the seals before they went out. Is that
15 fair?

16 A That's fair, yes.

17 Q Okay. And then when the machines
18 came back, did you ever see anyone check the seals
19 before they went back into the vault?

20 A I did not.

21 Q Is it fair to say there wasn't a
22 policy or a practice that you're aware of in the

1 office to do that?

2 A Not that I'm aware of.

3 Q Okay. The Dominion system also uses
4 additional equipment, like a printer, for example,
5 right, that prints a ballot?

6 A Correct.

7 Q Was Mandy also responsible for taking
8 all the associated equipment, like the printers,
9 that would be used with the touchscreens?

10 A Correct.

11 Q So she took everything that had to be
12 set up in a precinct for voting, she took that?

13 A Correct.

14 Q Including scanners?

15 A The huge big black --

16 Q The scanners that would go out to the
17 precincts where the ballots would be scanned, she
18 would take that to the --

19 A Yes, the big huge -- I called it, it
20 looked like a trashcan.

21 Q It was a scanner that sat on top of a
22 bin and people sometimes called it trashcans?

1 A Yes. And it was locked. There was a
2 big huge lid and it was locked. And there was
3 probably at least 15 seals that went all the way
4 around it.

5 Q And similar to what we talked about
6 on the touchscreens, did you ever see anyone
7 inspect the seals on those bins either before they
8 went out or after they came back from voting?

9 A I personally did not.

10 Q You personally didn't do it, but you
11 also did not see anyone do it?

12 A Right. That doesn't mean it wasn't
13 done.

14 Q Understood. Understood.
15 You and Ms. Hampton were the only two
16 who worked in the Elections Office, right?

17 A Correct.

18 Q So if it wasn't you, fair to say it
19 would have to be Ms. Hampton?

20 A Correct.

21 Q Ms. Ridlehoover, do I understand
22 right, you are represented by two lawyers today,

1 Mr. Lott and Mr. Delk?

2 A Correct.

3 Q And are you aware that Mr. Delk also
4 represents your boss, Eric Chaney?

5 A Correct.

6 Q Are you aware that he also represents
7 Coffee County, your former employer?

8 A Correct.

9 Q And have you considered whether that
10 creates a conflict?

11 MR. DELK: Object to the form. That
12 calls for a legal conclusion.

13 COURT REPORTER: Mr. Delk objected?

14 MR. DELK: Correct. If there's any
15 objections, it'll be made by me today.

16 BY MR. CROSS:

17 Q Have you considered whether that
18 creates a conflict?

19 MR. DELK: You can answer if you
20 know. If you don't know, you don't know.

21 THE WITNESS: I don't know.

22

1 BY MR. CROSS:

2 Q You haven't thought about it. Is
3 that fair?

4 A No.

5 Q Okay. Did you interact with any
6 member of the Coffee County Election Board when you
7 were employed there?

8 A At board meetings.

9 Q And how often were there board
10 meetings?

11 A Just once a month.

12 Q Did those board meetings typically
13 take place in your office?

14 A Correct.

15 Q So the full board would come in, or
16 most of the board would come in, for a meeting,
17 meet in your office and -- and have whatever
18 discussion they had?

19 A Correct.

20 MR. DELK: Just so we're clear on the
21 question, all persons in the building, what her
22 space was?

1 MR. CROSS: Yeah.

2 MR. DELK: But I know what you're
3 talking about, just so the record is accurate.

4 MR. CROSS: Right.

5 BY MR. CROSS:

6 Q And when they had their meetings, was
7 it in the physical room where your desk is at?

8 A Correct.

9 Q Did you typically attend all those
10 meetings?

11 A Correct.

12 Q Who else typically attended those
13 meetings?

14 A All of the Board.

15 Q And Ms. Hampton?

16 A Yes, correct.

17 Q Were those meetings typically open to
18 the public?

19 A Correct.

20 Q Did they sometimes go into what's
21 called executive session?

22 A Yes.

1 Q And in executive session it would not
2 be open to the public?

3 A Correct.

4 Q Did you participate in meetings that
5 were in executive session?

6 A No, I did not.

7 Q Did Ms. Hampton?

8 A No, she did not.

9 Q So executive session, in your
10 experience, was only the members of the Board?

11 A Correct.

12 Q Did the meetings sometimes include
13 lawyers?

14 A Not that I recall.

15 Q Do you know Tony Rowell?

16 A Yes.

17 Q How do you know him?

18 A He was the county attorney.

19 Q Did he sometimes participate in the
20 meetings?

21 A Okay. Yes, he -- not usually, but
22 occasionally if there was a question.

1 Q You understand that Tony Rowell is at
2 the same firm as Mr. Delk?

3 A Yes, correct.

4 COURT REPORTER: I'm sorry, Counsel.
5 Can you repeat what you said? You broke up on my
6 end. I didn't hear your question at all.

7 MR. CROSS: Sure.

8 BY MR. CROSS:

9 Q You understand that Mr. Rowell was at
10 the same firm as Mr. Delk?

11 A Correct.

12 Q There were meeting minutes prepared
13 for each of these meetings typically, right?

14 A Correct.

15 Q Were there any meetings that you were
16 aware of where there were no minutes prepared?

17 A Not that I'm aware of.

18 Q In your time there, who was
19 responsible for taking notes for the minutes?

20 A Misty.

21 Q So did you also take notes to help?

22 A Sometimes, but she never -- she

1 always did that.

2 Q So Ms. Hampton would take notes and
3 type them up as minutes?

4 A Correct.

5 Q Did you ever type up notes?

6 A Not that I remember. I mean, if I
7 did, it might have been once where she was on
8 vacation, but I -- I honestly do not remember.

9 Q How were you paid by the County?
10 Were you salaried or hourly?

11 A Hourly.

12 Q Did you have set number of hours you
13 were expected to work each week?

14 A I was there from 8:30 to 5:00 every
15 day.

16 Q So about 40 hours a week?

17 A Correct.

18 Q And how did you track your -- your
19 time?

20 A I handwrote it in.

21 Q On what?

22 COURT REPORTER: Can you repeat your

1 answer?

2 THE WITNESS: I wrote it down. We
3 had a makeshift time sheet that said Monday,
4 Tuesday, Wednesday, Thursday, Friday. And I wrote
5 my time on Monday, when I clocked out for lunch,
6 when I came back from lunch, when I left for the
7 day.

8 BY MR. CROSS:

9 Q And when you say "makeshift" --

10 A It was just a hand-typed one. You
11 know, the -- like a template you get offline.

12 Q Okay. So each morning you would come
13 into work, you had a hard-copy template that had
14 the dates of the week?

15 A Correct.

16 Q And you'd write the time you came in?

17 A Correct.

18 Q When you left for lunch, you'd write
19 that time?

20 A Correct.

21 Q You came back, you'd write that time?

22 A Correct.

1 Q When you left the day, you'd write
2 that time?

3 A Correct.

4 Q And what did you -- what did you do
5 with the time sheet when you were done?

6 A I gave it to Misty.

7 Q And did you sign it or anything?

8 A Yes.

9 Q And was this a weekly thing?

10 A We got paid about every two weeks.

11 Q So did your time sheet cover two
12 weeks?

13 A Correct.

14 Q So you'd have a piece of paper just
15 sitting on your desk?

16 A Well, in a drawer.

17 Q So you have this piece of paper, for
18 two weeks you'd write down all your time. At the
19 end of the two weeks you would sign it?

20 A Correct.

21 Q And then you would give that to
22 Ms. Hampton?

1 A Correct.

2 Q Do you know what she would with it?

3 A She got where she was scanning it --
4 or typing it in and e-mailing it.

5 Q So she would take what was on the
6 hard copy, type it into an e-mail and send that to
7 the Board?

8 A No. Send that to a lady that did --
9 who did the payroll.

10 Q At the County?

11 A Yes.

12 Q Okay. And did she include you on
13 those e-mails?

14 A No.

15 Q Do you know why the practice wasn't
16 just to send the hard copy on?

17 A It was she -- I guess she thought it
18 was easier to e-mail it instead of scanning it in
19 and taking the extra step. I honestly do not know.
20 I can't answer that.

21 Q What would happen to the hard copy
22 once she would send the e-mail?

1 A I have no clue.

2 Q So you guys didn't keep it in a file
3 for --

4 A I'm sure -- I can't answer for her.

5 Q Sure.

6 You just hand it to her, she e-mailed
7 it off, and then from there, you don't know where?

8 A Correct.

9 Q And this was done every two weeks?

10 A Correct.

11 Q For the whole five or six years you
12 were there?

13 A Correct.

14 Q And do I understand right that
15 Ms. Hampton, she wasn't hourly, she was salaried?
16 Do you know?

17 A I'm not sure.

18 Q And what was your hourly rate, if you
19 don't mind me asking?

20 A Ten --

21 MR. DELK: I want to object to the
22 form.

1 But you can respond.

2 THE WITNESS: I honestly don't
3 remember.

4 BY MR. CROSS:

5 Q More or less than \$10 an hour?

6 A I -- I would say around 10. I
7 honestly do not remember exact.

8 Q And did you get overtime since you
9 were hourly?

10 A Yes.

11 Q So if you worked more than 40 hours
12 in a week, they would pay you overtime for those
13 hours?

14 A Correct.

15 Q And was that time and a half?

16 A I'm not sure.

17 Q So if you worked more than 40 hours,
18 would you get -- for those extra hours, would it be
19 your hourly rate plus 50 percent more or you don't
20 know?

21 A I don't know.

22 COURT REPORTER: Counsel, if we could

1 go off the record. I see there's another
2 stenographer on the screen.

3 MR. CROSS: Yeah, let's go off the
4 record.

5 VIDEOGRAPHER: Okay. We're going to
6 go off the record at 10:17.

7 (Recess from 10:17 a.m. to 10:18 a.m.)

8 (Whereupon, the following proceedings on
9 pages 46 through 181 were
10 stenographically reported and transcribed
11 by Felicia A. Newland, CSR.)

12 VIDEOGRAPHER: Okay. We are on the
13 record at 10 -- hold on, my bad. We are on the
14 record at 10:18.

15 BY MR. CROSS:

16 Q Ms. Ridlehoover, when you filled out
17 your time sheets, were you careful to capture the
18 time that you actually worked?

19 A Yes.

20 Q So the process we talked through
21 where you would write down the time that you left
22 or came in, whether for work or for lunch, you were

1 meticulous about keeping that correct?

2 A Yes.

3 Q Did anyone suggest to you that --
4 that you should inflate your hours?

5 A No.

6 Q Did you at any point inflate your
7 hours?

8 A No.

9 Q You left the Coffee County Election
10 office in February of 2021. Does that sound right?

11 A Correct.

12 Q More precisely, do you recall the
13 date was February 25th?

14 A I do not recall the date.

15 Q Okay. But the spring of 2021. Does
16 that sound right?

17 Or maybe that's still winter, I don't
18 know. First couple months of the year?

19 A I honestly don't know if it was
20 '20 or '21, because I have been at where I'm at
21 working now for two years.

22 Q Okay.

1 A And it's only 2022.

2 Q You were -- you were still there for
3 the 2020 presidential election?

4 A Yes, correct.

5 Q Okay. So you would have left after
6 that?

7 A Correct.

8 Q Okay. And do you recall that you
9 were still there for the -- the January 2021 senate
10 runoff that got a lot of attention, Senator
11 Warnock?

12 A Yes.

13 Q Okay. So you left sometime after
14 that?

15 A Yes.

16 Q But it was shortly after that?

17 A Yes.

18 Q Okay. And when you left, do you
19 recall you participated in a meeting with the
20 Coffee County Election Board?

21 A Yes.

22 Q Describe for me what happened in that

1 meeting, if you will.

2 A I -- I just came in and they said
3 that we had put more time than what we had had, and
4 I argued I did not and that was that.

5 Q Okay. And you and Ms. Hampton both
6 met with the Board that day, right?

7 A Correct.

8 Q Did you meet together or separately
9 with the Board?

10 A Separately.

11 Q Did she go first?

12 A Yes.

13 Q When she came out of her meeting, did
14 you guys talk?

15 A No.

16 Q So she came out and left?

17 A Well, she came out and said, "We're
18 fired." Then I went in.

19 Q Okay.

20 A I don't think that's talking.

21 Q No, that's -- that's fair.

22 Did she tell you why she was fired?

1 A No.

2 Q So then you went in, you walked into
3 the room. Where was the meeting?

4 A It was in the courthouse in the
5 commissioners office.

6 Q Was the full Board there?

7 A I honestly do not remember.

8 Q But Eric Chaney was there?

9 A Yes.

10 Q Tony Rowell was there?

11 A Yes.

12 Q So you come in. Did you sit down?

13 A Yes.

14 Q How long did it last about?

15 A I do not remember.

16 Q Would you say more than 15 minutes?

17 A I honestly can't say yes or no. I
18 don't remember.

19 Q Do you think it was more than an
20 hour?

21 A No.

22 Q Okay.

1 MR. DELK: I just want to assert a
2 standing objection on this. I don't know if that
3 was an executive session or not. Subject to that,
4 you can explore that.

5 MR. CROSS: Okay.

6 That was Mr. Delk, Felicia. I know
7 you're new to this.

8 MR. DELK: Oh, yeah, I'm sorry. I
9 forgot we swamped out. I'll be the only one
10 stating objections probably.

11 BY MR. CROSS:

12 Q So when you came in, you sat down.
13 What's the first thing that you recall they said to
14 you?

15 A I do not remember.

16 Q Okay. But at some point they said to
17 you that they believed you had misrepresented time
18 sheets?

19 A Yes.

20 Q Okay. And you said not true?

21 A Yes.

22 Q Did they tell you they had reviewed

1 video surveillance that they had believed showed
2 you had misrepresented time sheets?

3 A Yes.

4 Q And what all can you tell me about
5 that?

6 A That's all I know.

7 Q Did they tell you where they got the
8 videos surveillance?

9 A No.

10 Q Did they tell you how many minutes or
11 hours they reviewed?

12 A No, not that I recall.

13 Q Okay. Did they give you any details
14 on what they reviewed on the surveillance?

15 A No.

16 Q Okay. Did they ask you to resign?

17 A No.

18 Q Okay. Did you resign?

19 A Yes.

20 Q Why did you resign?

21 A I honestly do not remember.

22 Q Did they say they were going to fire

1 you if you did not resign?

2 A I do not remember that.

3 Q Did they say if -- well, never mind.

4 Did you get any retirement from the
5 County?

6 A I honestly don't know.

7 Q Do you -- do you receive any money --
8 any payments from the County since you left your
9 position there?

10 A No.

11 Q Okay. Did they have a draft letter
12 of resignation for you to sign?

13 A Honestly that day was emotional, I
14 don't remember.

15 Q Do you recall signing a resignation
16 letter?

17 A I do not remember. I mean, I'm sure
18 I did, but honestly, I do not remember that.

19 MR. DELK: I'm going to instruct her
20 again, if you don't recall, that's your answer, but
21 don't --

22 THE WITNESS: Okay.

1 MR. DELK: -- don't guess or
2 speculate.

3 BY MR. CROSS:

4 Q Absolutely, don't guess or speculate,
5 only what you remember. That's okay. Take your
6 time. You're doing fine.

7 Just so I understand, you informed
8 them you had not been inaccurate in your time
9 sheets in any way, and at some point in that
10 meeting you resigned?

11 A Correct.

12 Q Okay. So let's go back a little bit.
13 They said they looked at surveillance. Was it
14 surveillance of your office, is that what they told
15 you?

16 A I don't know. I mean, I don't -- I
17 don't --

18 MR. DELK: That's all, if you know,
19 you know --

20 THE WITNESS: I don't know --

21 MR. DELK: -- if you don't, you
22 don't.

1 THE WITNESS: -- where they got it
2 from.

3 BY MR. CROSS:

4 Q Okay. And just, again, if you don't
5 remember, that's fine too.

6 Do you recall what they told you
7 about where they got surveillance videos?

8 A I do not recall.

9 Q Okay. But they -- what they told you
10 was they looked at video surveillance that they
11 claim indicated you recorded time for when you were
12 not in the office. Is that fair?

13 Is that what they told you?

14 A I honestly don't remember. I don't
15 remember what they told me.

16 Q Okay. So let's go back to your
17 office.

18 Were there cameras in that office, to
19 your knowledge?

20 A To my knowledge there was only one in
21 the corner of the break room.

22 Q Where is the break room?

1 A You walk through where I sat and it
2 was through that other door, you know, right there.

3 Q Okay. So once you're in your space,
4 you've got your desk that faces the window and that
5 window faces the door to the parking lot?

6 A Correct.

7 Q And so if I come through the door
8 from the foyer, your desk is on my right and Misty
9 Hampton's office is on the left?

10 A When you walk straight through that
11 door, you walk straight through me.

12 Q Okay.

13 A You would walk straight to me.

14 Q Okay. And there's a break room at
15 some point in there?

16 A Yes.

17 Q And there's a door to the break room
18 or is it just open?

19 A Honestly I do not remember if there's
20 a door or not.

21 Q Okay. And the break room, that was a
22 room where you and Ms. Hampton would take a break?

1 A Yes.

2 Q Okay. And is there table and chairs
3 in there?

4 A Yes.

5 Q And that the only camera that you
6 remember is in that room?

7 A Yes. In there -- yes.

8 Q Do you recall any cameras that would
9 have captured the space where you sat?

10 A I have no knowledge of that.

11 Q Do you recall any cameras that would
12 have captured Ms. Hampton's office?

13 A I have no knowledge of that.

14 Q Do you recall any cameras that would
15 have captured the GEMS room?

16 A I have no knowledge of that.

17 Q Do you recall any cameras that would
18 have captured that foyer that sat outside your
19 office where people would come into the building?

20 A That, I'm assuming -- I'm guessing
21 that's -- that's where the camera was facing.

22 MR. DELK: Don't guess.

1 BY MR. CROSS:

2 Q When you say -- okay. Let's -- let's
3 just go back.

4 When you say that's where the camera
5 was facing, what camera?

6 A There was -- I never saw any video
7 footage from the camera.

8 Q Uh-huh.

9 A I don't know what it showed.

10 Q So the only camera you ever saw with
11 your own eyes was in the break room?

12 A Above the break room door.

13 Q Right, above the break room door.
14 So what did that camera capture?

15 A I do not know.

16 Q But it wasn't in the break room, it
17 was outside the break room?

18 A Correct.

19 Q Facing away from the break room?

20 A Correct.

21 Q Okay. Facing into what?

22 A I do not know.

1 Q Okay. Well, if you were going to
2 stand and look at that camera, where would you
3 stand?

4 Where would you be, in your office or
5 what?

6 A I would say technically I was not in
7 an office, I was in an open room.

8 Q So did that -- did that camera, was
9 it pointed at that open room?

10 A I have no clue. I didn't put it up.

11 Q Right. But if you were just to look
12 at the camera, you could see the lens on the
13 camera, right?

14 You could see the glass part of the
15 camera?

16 MR. DELK: If you know. If you
17 don't, you can tell --

18 THE WITNESS: It was just a round
19 ball.

20 BY MR. CROSS:

21 Q It was just a round ball?

22 A A round ball.

1 Q Okay. I see. What you're saying,
2 it's just a round glass ball --

3 A It's just a round ball.

4 Q -- that sat on the ceiling --

5 A It was just there in that corner,
6 just like that light. I mean, it was just there.

7 Q I see what you're saying.

8 Okay. So there's a round -- I got
9 you. I was picturing it more visual.

10 So it's a round glass ball, there's a
11 camera inside. And you don't know where the camera
12 is facing inside that ball?

13 A Correct.

14 Q I see.

15 But that glass ball sat on the
16 ceiling outside the break room?

17 A Correct.

18 Q And so it sat on the ceiling in the
19 space where your desk was?

20 A Correct.

21 Q Okay. Got it. Thank you. Sorry.

22 And so when you met with the Board,

1 they did not show you any video surveillance?

2 A No.

3 Q And the only camera that you're aware
4 of in that entire office is the one that you
5 described?

6 A I'm going to say there was one that
7 was on the advanced voting site. There was on the
8 advanced voting site.

9 Q Got it.

10 So in that room where the advanced
11 voting was set up, was there another one of those
12 glass ball -- ball cameras on the ceiling. Is that
13 what you remember?

14 A Yes.

15 Q Okay. And in that main foyer where
16 people would come in to the window where you sat,
17 do you recall if there was anything that looked
18 like a camera in there?

19 A I do not remember.

20 Q Okay. When you went to and from work
21 or to lunch, did you always go through that foyer?

22 A Yes.

1 Q Was there another door into your
2 space other than that door that led to the front
3 door?

4 There was a door that led to the
5 early voting room, right, from your space?

6 A It was down a long hallway.

7 Q But there was a door to get to your
8 space from the early voting room, right?

9 A Correct.

10 Q And the early voting room had its own
11 exterior door to the parking lot, right?

12 A Correct.

13 Q Okay. Did you ever speak with anyone
14 on the Board about your departure from the Coffee
15 County Election Office other than in that meeting?

16 A I do not recall.

17 Q Okay. Eric Chaney hired you at his
18 dealership shortly after --

19 A Correct.

20 MR. DELK: Let him -- make sure you
21 let him finish --

22 THE WITNESS: Okay.

1 MR. DELK: -- his question. You're
2 fine.

3 BY MR. CROSS:

4 Q Do you remember approximately how
5 long after you left the Coffee County Election
6 Office you started working for Mr. Chaney?

7 Was it days or weeks?

8 A Maybe two weeks.

9 Q Okay. And did he contact you or you
10 contacted him?

11 A He contacted me.

12 Q Called you?

13 A Yes.

14 Q Okay. And he said, "I'd like to hire
15 you at the dealership"?

16 A I don't remember exactly what was
17 said.

18 Q But he offered you a job?

19 A Correct.

20 Q And you took the job?

21 A Correct.

22 Q Okay. And you've been working with

1 him ever since?

2 A Correct.

3 Q Do you recall if at any point in time
4 that you've been working with him discussing your
5 departure from the County office?

6 A Never discussed it, not I recall.

7 Q Is it fair to say that in hiring you,
8 he didn't express any concerns to you about your
9 reliability or your honesty?

10 A No.

11 MR. DELK: Object to the form.

12 THE WITNESS: Oh, no.

13 BY MR. CROSS:

14 Q Did you ever consider whether the
15 Coffee County Election Board forced you out of the
16 office for reasons other than the reason they gave?

17 MR. DELK: Object to the form.

18 BY MR. CROSS:

19 Q Just yes or no; have you thought
20 about that?

21 A No.

22 Q In the time that you were in the

1 Coffee Election Office, from time to time would
2 there be people in that office other than yourself
3 and Ms. Hampton?

4 A I'm not really understanding what you
5 mean.

6 Q Sure.

7 So did you ever see anybody come into
8 the Coffee County Election Office, not just in that
9 foyer, but back in your space where you worked, who
10 was not yourself, Ms. Hampton or a member of the
11 Board or counsel for the Board, anyone else?

12 MR. DELK: Just in a general sense
13 ever?

14 MR. CROSS: Ever.

15 THE WITNESS: Yes.

16 BY MR. CROSS:

17 Q Okay. And, for example, did you
18 ever -- do you know Ed Voyles?

19 A Yes.

20 Q Did he ever come inside the office
21 into your space?

22 A Yes. Him and Misty went in her

1 office. Like, she would call people into her
2 office for a meeting or whatever.

3 Q Okay.

4 (Discussion had off the record.)

5 VIDEOGRAPHER: We are going off the
6 record at 10:34 a.m.

7 (Recess from 10:34 a.m. to 10:44 a.m.)

8 VIDEOGRAPHER: We are back on the
9 record at 10:44.

10 BY MR. CROSS:

11 Q All right. Ms. Ridlehoover, let me
12 hand you what I'm going to mark as Exhibit 1.

13 (Ridlehoover Deposition Exhibit Number 1
14 marked for identification.)

15 BY MR. CROSS:

16 Q So this is a -- a local news article
17 entitled, "Board of Elections accepts employee
18 resignations, election office temporarily closed."

19 Do you see that on the top of the
20 page?

21 A Yes.

22 Q And it looks to be from March 3rd,

1 2021, from Robert Preston. Do you see that?

2 A Yes.

3 Q Do you know Robert Preston?

4 A Yes.

5 Q How do you know him?

6 A He runs DoulgasNow.

7 Q Okay. Has he ever been in the Coffee
8 County Election Office?

9 A Yes.

10 Q And you've been there with him in the
11 office? You've seen him in the office?

12 A Yes.

13 Q Okay. And if you flip to the
14 article, it begins by pointing out that on February
15 25th, 2021, two employees of Coffee County
16 Elections Office, Misty Hampton and Jil
17 Ridlehoover, resigned.

18 Do you see that?

19 A Yes.

20 Q Does that help refresh your memory
21 that you resigned on February 25th of 2021?

22 A I'm reading it.

1 Q Okay. But do you have any reason to
2 think that's wrong?

3 MR. DELK: Object to the form.

4 You can answer.

5 THE WITNESS: No.

6 BY MR. CROSS:

7 Q Okay. And then if you come down the
8 fourth paragraph, do you see it begins with your
9 name? It says, "Ridlehoover's letter states," the
10 fourth paragraph.

11 A I'm trying to get my eyes focused --

12 Q Okay.

13 A -- just a second, I don't have my
14 glasses.

15 Yes, I see that.

16 Q Okay. And it says, "Ridlehoover's
17 letter states that, quote, the County contends that
18 I submitted time sheets for time worked, and was
19 thereafter paid, when in fact I did not work all
20 the hours I submitted for payment."

21 Do you see that?

22 A Yes.

1 Q Why did you sign a letter indicating
2 that you had submitted time sheets for hours for
3 which you were paid, but did not work?

4 A Well, on advice of counsel, I
5 respectfully decline to answer on the basis of my
6 rights and privileges under Article 1, Section 1,
7 Paragraph 16 of the Georgia Constitution and the
8 Fifth Amendment of the United States Constitution
9 and Georgia law.

10 MR. DELK: Can we get the same
11 stipulation that we've been having --

12 MR. CROSS: Yes.

13 MR. DELK: -- if that issue does come
14 up again?

15 MR. CROSS: Yeah. All she has to say
16 is "Fifth Amendment" and it'll capture the
17 statement.

18 BY MR. CROSS:

19 Q Let me hand you what's been marked as
20 Exhibit 2.

21 (Ridlehoover Deposition Exhibit Number 2
22 marked for identification.)

1 BY MR. CROSS:

2 Q And just tell me if this is something
3 that you've seen before.

4 A Yes.

5 Q And if you flip through it, you'll
6 see this is a subpoena that you received to produce
7 documents in this case, right?

8 A Correct.

9 Q Would you turn to the page at the top
10 that says Attachment A? Do you see that?

11 Have you read that before?

12 A Yes.

13 Q And just walk me through what you
14 did, if anything, to look for documents responsive
15 to these requests?

16 A I had none.

17 Q And how did you look for them?

18 MR. DELK: And I'll instruct you not
19 to say anything that we've discussed in any meeting
20 with counsel, but he's just talking about actions
21 outside of any meeting or correspondence with us.

22

1 BY MR. CROSS:

2 Q Just describe your actions.

3 A Well, honestly, I knew I had nothing.

4 Q So do you use a smartphone?

5 A I do.

6 Q How long have you had that phone?

7 A I use mine until they don't work no
8 more.

9 Q Is it the same phone you had when you
10 were in the Elections Office?

11 A Yes.

12 Q Okay. When you received the document
13 subpoena, did you, for example, pick up your phone
14 and run searches for, like, Misty Hampton's name?

15 A No, I did not.

16 Q Did you search for Eric Chaney?

17 A No, I did not.

18 Q Okay. Did you -- did you grab your
19 phone and do any kind of searches in your text
20 messages or e-mails? Photos? Videos? Anything?

21 A I knew I didn't have any.

22 Q But you didn't actually look?

1 A No.

2 Q Okay. Did you from time to time send
3 text messages when you were in the Elections Office
4 with Ms. Hampton?

5 A Yes.

6 Q Did you from time to time send text
7 messages with Eric Chaney?

8 A No. I'm -- well, board meetings,
9 "Don't forget board meetings."

10 Q Okay. Did you from time to time send
11 text messages when you were in the Elections Office
12 with other members of the Board?

13 A Only, "Don't forget the board
14 meeting."

15 Q Did you from time to time send
16 e-mails using your personal device related to the
17 Coffee County Elections Office?

18 A No.

19 Q Did you ever make any photos or
20 videos inside the office?

21 A No.

22 Q Did anyone ever send you any photos

1 or videos related to the Coffee County Elections
2 Office?

3 A Not that I recall.

4 Q Did you ever text anyone besides
5 Ms. Hampton related to the Coffee County Election
6 Office or Coffee County Elections?

7 A No.

8 Q Do you recall that in December of
9 2020, Ms. Hampton and Eric Chaney and some others
10 recorded a video in the Coffee County Election
11 Office showing how the adjudication process worked
12 on the Dominion system?

13 A Yes.

14 Q And you were there for that?

15 A Yes.

16 Q And the video was recorded in the
17 GEMS room?

18 A I was at my desk, I do not know.

19 Q Okay. But the -- the adjudication
20 process with the Dominion system, you understand
21 that happens in the GEMS room?

22 A Yes.

1 Q And that -- this day -- that day, in
2 December 2020, you saw Ms. Hampton, Mr. Chaney, and
3 others, in the GEMS room filming that video. Is
4 that fair?

5 MR. DELK: Object to the form.

6 THE WITNESS: They were in the room.
7 I do not know what they were doing.

8 BY MR. CROSS:

9 Q They were in the GEMS room?

10 A Yes.

11 Q But at some point that video became
12 public on YouTube?

13 A I've never watched it.

14 Q But you're aware of it?

15 A Yes.

16 Q Are you aware that you are in that
17 video?

18 A No, I'm not.

19 (Ridlehoover Deposition Exhibit Number 3
20 marked for identification.)

21 BY MR. CROSS:

22 Q So, Ms. Ridlehoover, what I've handed

1 you is a screenshot from that YouTube video that we
2 took offline. And if you look at it, there's -- do
3 you see the two men?

4 A Uh-huh.

5 Q Yes?

6 A Yes.

7 Q So there's a man in a blue shirt,
8 right?

9 A Yes.

10 Q There's a man behind him that looks
11 like maybe in a Navy sports coat?

12 A Yes.

13 Q There's a man next to him in khaki
14 pants?

15 A Yes.

16 Q And then the woman in the back in the
17 pink, that's you?

18 A Yes.

19 Q Okay.

20 A Like I said, I was unaware I was in
21 the picture.

22 Q Okay. That's fine. Now you know

1 you're famous.

2 The man in the blue shirt, do you
3 remember who that was?

4 A I do not.

5 Q What about the man behind him in the
6 blue jacket?

7 A Honestly, I cannot see who it is. If
8 I had my glasses.

9 Q Do you have glasses in your car?

10 A I do not. They're at the office.

11 MR. CROSS: Does anybody have reading
12 glasses? Are those reading glasses? Let's just
13 try them. See if that helps.

14 VIDEOGRAPHER: I only have
15 prescription in my right eye so it may work.

16 THE WITNESS: Oh, snap, look there.
17 You might not get these back.

18 VIDEOGRAPHER: Oh, yes, I will.
19 Those are Walmart brand.

20 BY MR. CROSS:

21 Q Do you recognize the man in the blue
22 jacket?

1 A It -- with all that facial hair?

2 Q Yes. You're seeing it real clear
3 now.

4 A It kind of looks like Mr. Ed Voyles,
5 but honestly I do not remember him with a beard.

6 Q Okay. The guy in the khaki pants and
7 the -- it looks like maybe a white button-down --

8 A I have no clue.

9 Q Okay. All right. That's fine.

10 THE WITNESS: These are yours.

11 VIDEOGRAPHER: Why don't you hold on
12 to them.

13 BY MR. CROSS:

14 Q Do you recall learning at some point
15 that visible in that same video was a Post-it note
16 on Misty Hampton's computer monitor where it was
17 identified as a password?

18 A Do what now?

19 Q Do you remember learning at some
20 point about this video -- you knew this video was
21 online?

22 A Yes.

1 Q Okay. Did you -- did you ever hear
2 that there was a Post-it note visible in that video
3 online that had what looked like a password written
4 on it?

5 A Yes.

6 Q Okay. And did you learn that that
7 Post-it note was visible on Misty Hampton's
8 computer monitor?

9 A Do what now?

10 Q Did you learn that that Post-it note
11 was visible on Misty Hampton's computer monitor?

12 A Personally, no, I did not realize.

13 No.

14 Q Okay. Do those work okay?

15 A That's fine. I haven't tried them.

16 Yeah.

17 Q Okay.

18 (Ridlehoover Deposition Exhibit Number 4
19 marked for identification.)

20 BY MR. CROSS:

21 Q All right. Let me hand you what's
22 been marked as Exhibit 4. So this is a -- this is

1 another screenshot from that video that we took.

2 A Uh-huh. Yes.

3 Q Do you recognize having seen this
4 Post-it note on Ms. Hampton's computer in her
5 office?

6 A I do not.

7 Q Was it on Ms. -- well, let's back up.

8 Do you recall seeing a Post-it note
9 like this on any computer screen in the office?

10 A I might have one on mine saying,
11 "Hey, you've got an appointment."

12 Q Do you remember a Post-it note that
13 had a password on it on the computer screen in the
14 office?

15 A I do not.

16 Q Did you, yourself, go into the GEMS
17 room from time to time?

18 A No. Not normally, no.

19 Q And you don't recall ever being in
20 the GEMS room and seeing a Post-it note like this
21 on the computer screen?

22 A No.

1 Q Do you know what is written on this
2 Post-it note?

3 A Just a bunch of jumbled letters and
4 numbers.

5 Q Okay. Do you know if it's a password
6 to something in the office?

7 A I do not.

8 Q Did you ever discuss -- this Post-it
9 note in the video, did you ever discuss that with
10 Ms. Hampton?

11 A No.

12 Q Is there any information that you
13 have about this Post-it note?

14 A No.

15 MR. DELK: Subject to any discussion
16 with us, don't talk about that.

17 MR. CROSS: Apparently you haven't
18 talked about it, she said no.

19 BY MR. CROSS:

20 Q Did you guys sometimes write
21 passwords on Post-it notes so they were easy to
22 remember?

1 A No. I don't do that.

2 Q Did Ms. Hampton?

3 A I do not know.

4 MR. DELK: Object to the form.

5 BY MR. CROSS:

6 Q Did you ever see her write a password
7 down on a Post-it note?

8 A Not to my knowledge, no.

9 Q Were you aware that there was a
10 Post-it note with the EMS -- well, hold on. Let me
11 back up.

12 Do you know what I mean when I say
13 the EMS server?

14 A Server.

15 Q Okay. And you understand there was a
16 server that sat in the GEMS room?

17 A Correct.

18 Q And you understand there was a
19 computer in there to log into that server?

20 A Yes.

21 Q Okay. And so there was a password
22 that was needed to access that server, correct?

1 A I do not know.

2 Q Okay. But you understood to get into
3 that server, somebody would have to go to that
4 computer and log in?

5 A I don't know because I never used it.

6 Q Okay. Did you ever -- did you ever
7 learn that there was a Post-it note pasted to the
8 underside of that desk that had the password on it
9 for the EMS server?

10 A I do not know.

11 Q Okay. All right. Ms. Ridlehoover, I
12 don't have a hard copy of this, but we've loaded it
13 as Exhibit 5, so I know the attorneys will have it
14 online.

15 (Ridlehoover Deposition Exhibit Number 5
16 marked for identification.)

17 BY MR. CROSS:

18 Q But this is another screenshot of --
19 if you can grab your glasses -- from the video.

20 A Oh, Lord, you're going to bring it up
21 here.

22 Q Yeah. It's another picture of the

1 guy with the white facial hair and then the guy in
2 the khakis.

3 A Yes, that is -- yes. Go ahead. I'm
4 sorry.

5 Q So the guy in the -- with the white
6 facial hair, does that still look like Ed Voyles?

7 A Yes.

8 Q And the guy in the khakis, now that
9 you see his face, who is he?

10 A That is Mr. Wendell Stone.

11 Q Wendell Stone. So he's on the Board?

12 A Yes.

13 Q And who is the woman seated?

14 A This is Diana, which is Misty's
15 daughter.

16 Q Okay. Thank you.

17 A Got it.

18 (Ridlehoover Deposition Exhibit Number 6
19 marked for identification.)

20 BY MR. CROSS:

21 Q All right. Let me show you what's
22 going to be Exhibit 6. Have you ever heard the

1 name Scott Hall?

2 (Discussion had off the record.)

3 BY MR. CROSS:

4 Q Have you ever heard the name Scott
5 Hall?

6 A Just recently.

7 Q Okay. Let me hand you what's going
8 to be marked as Exhibit 6. And get your glasses if
9 you need them. Do you recognize him?

10 A No.

11 Q You don't recall ever seeing him in
12 the Coffee County Election Office before?

13 A I do not recognize him.

14 Q So you see the date at the top there,
15 it says, Thursday, January 7, 2021, and there's a
16 time underneath, 11:42 a.m.?

17 A Yes.

18 Q This is from a text message from that
19 date. Do you remember being in the office on
20 January 7, 2021?

21 A I'm sure I was.

22 Q Okay. Do you recall on January 7th,

1 2021, a team of individuals came into the office
2 with equipment and went into the GEMS room?

3 A I remember people coming in, but I do
4 not remember any equipment.

5 Q Describe for me the people who came
6 in, as best as you can.

7 A I do not know. It could have been
8 you.

9 Q Okay. It wasn't me, just to be
10 clear.

11 But you saw a team of individuals
12 come into the office on January 7th, 2021, and they
13 came into the space where you sat, right?

14 A Yes.

15 Q And did some of them also go into
16 Ms. Hampton's office?

17 A Yes.

18 Q And did some of them also go into the
19 GEMS room?

20 A I do not know.

21 Q Okay. When they came in, were they
22 carrying any kind of equipment?

1 A I have no clue.

2 MR. DELK: Object to the form.

3 BY MR. CROSS:

4 Q Were they carrying any kind of bags
5 and briefcases?

6 A I cannot remember.

7 Q Was it both men and women?

8 A I vaguely remember a lady.

9 Q Can you describe her?

10 A No.

11 Q What color of hair?

12 A I do not know.

13 Q Do you remember that she had a bit of
14 an -- an unusual accent?

15 A I do not remember.

16 (Ridlehoover Deposition Exhibit Number 7
17 marked for identification.)

18 BY MR. CROSS:

19 Q I will hand you what we'll mark as
20 Exhibit 7. The woman in Exhibit 7, does that look
21 like the woman who came in that day?

22 A I do not remember.

1 Q And this is a woman that -- are you
2 familiar with a firm in Georgia called Sullivan
3 Strickler?

4 A No, I'm not.

5 Q So you -- you vaguely remember there
6 was a woman that came in with this team on the 7th,
7 but you -- you don't remember if it was a woman in
8 Exhibit 7?

9 A I do not.

10 Q And nothing you can tell me about
11 her?

12 A No.

13 Q And looking back at Exhibit 6, a
14 picture of Scott Hall, just take your time with it.
15 Do you recall seeing him in --

16 A I do not.

17 MR. DELK: Make sure to let him
18 finish his question.

19 THE WITNESS: I know. I know.

20 MR. DELK: You're fine. Sometimes
21 you know where he's going, just let him finish.

22

1 BY MR. CROSS:

2 Q How many people, approximately, came
3 in that day?

4 A I do not know.

5 Q Do you recall that it was around four
6 or five?

7 A I do not remember.

8 Q Do you recall that they came in from
9 mid to late morning?

10 A I do not remember.

11 Q And they were there all day?

12 A Yes.

13 Q They left sometime in the evening?

14 A I do not know.

15 Q Where -- where did you see them while
16 they were there?

17 A I stayed at my desk.

18 Q So they were not in your space for
19 most of the day?

20 A Correct.

21 Q You saw them go into Ms. Hampton's
22 office?

1 A Correct.

2 Q And they were in there for some
3 extended period?

4 A Yes.

5 Q Okay. You -- do I understand
6 correctly, you cannot see into the GEMS room
7 from -- from your desk?

8 A Correct.

9 Q So you saw them go into Ms. Hampton's
10 office and you're saying you don't know whether
11 they also then went into the GEMS room because you
12 can't see into that room?

13 A I do not.

14 Q But they would have gotten into the
15 GEMS room through Ms. Hampton's office. That's the
16 access point, right?

17 MR. DELK: Object to the form.

18 BY MR. CROSS:

19 Q It's the only door -- let me ask a
20 better question.

21 The only door to the GEMS room is
22 from Ms. Hampton's office?

1 A Correct.

2 Q Okay. Did you hear them talking at
3 all during the day?

4 A They talked, but I was not paying
5 attention to anything they said.

6 Q Did it surprise you to see a team of
7 people come in that day and go into her office?

8 A Yes.

9 Q Why? Was it unusual?

10 A I didn't know -- I didn't know what
11 they were doing.

12 Q So no one gave you a heads-up these
13 people were coming there?

14 A No.

15 Q No one told you why they were there?

16 A No.

17 Q Did you ask?

18 A No.

19 Q Why not?

20 A I take the Fifth.

21 MR. CROSS: Could we go off the
22 record?

1 VIDEOGRAPHER: We are off the record
2 at 11:08.

3 (Recess from 11:08 a.m. to 11:12 a.m.)

4 VIDEOGRAPHER: We are on the record
5 at 11:12.

6 BY MR. CROSS:

7 Q All right. Ms. Ridlehoover, we were
8 talking about January 7th. Do you recall that some
9 of the people that we were just talking about who
10 came in on January 7th, they also came back the
11 next day, right, on January 8th?

12 MR. DELK: Object to the form.

13 THE WITNESS: I do not remember.

14 BY MR. CROSS:

15 Q Okay. Do you recall that some of
16 those people came back on January 19, came back a
17 couple of weeks later?

18 A I do not remember.

19 Q Okay. Let me show you what's been
20 marked as Exhibit 7 -- 8.

21 (Ridlehoover Deposition Exhibit Number 8
22 marked for identification.)

1 BY MR. CROSS:

2 Q Okay. Tell me if you recognize the
3 person in Exhibit 8.

4 A I do not.

5 Q So this is a man named Paul Maggio.
6 Do you recall anyone who came into the office on
7 January 7th, 2021, that looked like him?

8 A I do not.

9 Q Okay. Again, you just don't remember
10 any details about those people at all?

11 A I do not.

12 Q So you're not saying he wasn't there,
13 you're saying you just don't remember?

14 A I do not. Sorry.

15 (Ridlehoover Deposition Exhibit Number 9
16 marked for identification.)

17 BY MR. CROSS:

18 Q Let me hand you Exhibit 9. Tell me
19 if you recognize the individual in Exhibit 9.

20 A I do not.

21 Q And actually the picture that I've
22 shown you before, are these -- like, Mr. Maggio we

1 just looked at, do you recognize as ever having
2 seen him at all anywhere?

3 A No.

4 Q And same with the picture of Scott
5 Hall, had you ever seen him?

6 A No.

7 Q And looking at Number 9, this is a
8 picture of a man named Dan Logan. Have you ever
9 seen him before?

10 A No.

11 Q That one at the top.

12 A No.

13 Q So you don't recognize him at all?

14 A No.

15 Q Again, you're not saying that he's
16 never been in the Coffee County Election Office,
17 you just don't remember one way or the other?

18 A Correct.

19 Q Okay.

20 (Ridlehoover Deposition Exhibit Number 10
21 marked for identification.)
22

1 BY MR. CROSS:

2 Q Exhibit 10. Have you ever seen the
3 man in Exhibit 10 before, please?

4 A No, I have not.

5 Q So this is a man named Greg Freemyer.
6 You don't recognize him at all?

7 A No.

8 Q You're not saying he's never been in
9 the Coffee County Elections Office, you just don't
10 recall one way or the other?

11 A Correct.

12 Q Okay.

13 (Ridlehoover Deposition Exhibit Number 11
14 marked for identification.)

15 BY MR. CROSS:

16 Q Exhibit 11, tell me if you recognize
17 the individual in Exhibit 11.

18 A No, I do not.

19 Q So you don't -- you don't recall one
20 way or the other whether he's ever been in the
21 Coffee County Election Office?

22 A I do not.

1 (Ridlehoover Deposition Exhibit Number 12
2 marked for identification.)

3 BY MR. CROSS:

4 Q Exhibit 12. Tell me if you recognize
5 the individual in Exhibit 12.

6 A I do not.

7 Q So you don't recall one way or the
8 other whether he's ever been in the Coffee County
9 Election Office?

10 A Correct.

11 Q Okay. Ms. Ridlehoover, we're going
12 to pull up an exhibit.

13 Just for the record, I asked you
14 earlier why you didn't ask anyone about why these
15 people were there. The question is withdrawn and
16 I'll strike that.

17 (Ridlehoover Deposition Exhibit Number 13
18 marked for identification.)

19 BY MR. CROSS:

20 Q All right. So these guys all have
21 Exhibit 13 online. Let me show you Exhibit 13.
22 This is another screenshot from the YouTube video

1 that was taken in the office in December 2020. The
2 guy in the blue shirt there, can you -- you can see
3 his face a little bit better. Do you recognize him
4 now?

5 A That's Matt. Matthew McCullough.

6 Q Okay. A board member?

7 A Correct.

8 Q And scroll down.

9 A Oh, gosh, that's me.

10 Q Okay. And if you come -- if you come
11 down to the second page, there's two individuals
12 there --

13 A Uh-huh.

14 Q -- you can see from the screenshot.
15 The one on the left in the pink shirt -- and we're
16 looking at Exhibit 13 -- that's Eric Chaney?

17 A Correct.

18 Q The one on the right is Wendell
19 Stone?

20 A Correct.

21 Q Okay. Thank you.

22 A You can give me that scroll, it ain't

1 happening.

2 Q So on January 7, 2021, you showed up
3 to work as usual?

4 A Correct.

5 Q You showed up on time?

6 A Correct.

7 Q What did you typically do when you
8 went into the office?

9 A Cut everything on. Put my water or
10 Mountain Dew in refrigerator. Got at my desk, put
11 it on. Got my system, my thingy up and went to
12 work.

13 Q Were you usually the first one in?

14 A Yes.

15 Q Okay. And you said you -- your hours
16 were typically 8:30?

17 A Correct.

18 Q Did you stay until 4:30?

19 A Until 5:00.

20 Q Until 5:00.

21 And so on January 7th, do you -- do
22 you remember that you were the first person there

1 that day?

2 A Yes.

3 Q So you came in and turned everything
4 on?

5 A Correct.

6 Q And then you, what, sat down at your
7 desk?

8 A Yes.

9 Q Before this team of people came in,
10 do you recall anyone else coming in that day?

11 A Just Misty and Diana, I would
12 assume -- Diana and Misty, they came in.

13 Q And Diana is Ms. Hampton's daughter?

14 A Correct.

15 Q And do you recall why Ms. Hampton's
16 daughter was there that morning?

17 A I do not.

18 Q How long was she there?

19 A I guess all day.

20 Q Okay. And again, I don't want you to
21 guess. You remember her coming in, do --

22 A I remember her coming in, I don't

1 remember when she left.

2 Q Okay. You don't -- you don't
3 remember seeing her walk out the door?

4 A No.

5 Q And she would have had to walk past
6 you to get out the door, right?

7 A Correct.

8 Q Do you remember roughly about how
9 long after you arrived before this team of people
10 came in?

11 A I do not.

12 Q But it is fair to say it was hours,
13 not minutes?

14 A Yes.

15 Q All right. Before lunch?

16 A I do not remember.

17 Q When did you typically take lunch?

18 A It just varied.

19 Q I assume there was a rough window in
20 the middle of the day?

21 A Usually on schooldays, I went to
22 lunch from 2:30 to 3:30 so I could go get my son

1 from school.

2 Q January 7, 2021, likely would have
3 been a schoolday, right?

4 A Yes.

5 Q So likely you would have left in that
6 same window that day?

7 A Yes.

8 Q And would that typically have been on
9 the schoolday the only time that you would have
10 been out of the office?

11 A Yes.

12 Q Are you a smoker?

13 A No.

14 Q Okay. So you don't walk out for
15 smoke breaks?

16 A No.

17 Q Good decision.

18 When these people -- when this team
19 of people showed up that morning, who let them in
20 to your space?

21 A I do not remember. I mean, I don't
22 know if the door was open. I honestly -- I don't

1 remember.

2 Q But you saw them come through the
3 parking lot door, you saw them through your window
4 first?

5 A I do not remember.

6 Q Okay. You remember that Eric Chaney
7 was there that day, right?

8 A I do not remember.

9 Q You remember that Cathy Latham was
10 there that day, right?

11 A I do remember Cathy.

12 Q And Cathy arrived sometime that
13 morning?

14 A I do not remember.

15 Q Okay. But she arrived before you
16 left to pick up your son?

17 A Yes.

18 Q And she was still there when you went
19 to pick up your son?

20 A I do not remember.

21 Q You recall seeing her come in, you
22 don't recall seeing her leave?

1 A Correct.

2 Q And she went into Ms. Hampton's
3 office with this team of people, right?

4 A I don't remember.

5 Q Well, if she was -- if she was in
6 your space, she would have been standing with you,
7 right?

8 MR. DELK: Object to the form.

9 You can respond.

10 THE WITNESS: I mean, I just sat at
11 my desk.

12 BY MR. CROSS:

13 Q Okay. Did you speak with her that
14 day, Cathy Latham?

15 A I don't remember.

16 Q All right. But you don't remember
17 her sitting in your space?

18 A No, I don't.

19 Q Do you recall her walking into
20 Ms. Hampton's office at some point?

21 A I do not remember.

22 Q Okay. You just recall that she came

1 into the building that day when the team was there
2 and --

3 A Correct.

4 Q -- you don't recall when she left?

5 A Correct.

6 Q Okay. Do you recall that Ms. Latham
7 came in that day holding a scanner?

8 A I do not.

9 Q And you don't recall that she brought
10 in some sort of device?

11 A I do not.

12 Q Okay. Have you ever heard the name
13 James Barnes?

14 A Yes.

15 Q Okay. And are you aware that James
16 Barnes placed Misty Hampton as the election
17 supervisor in Coffee County?

18 A Yes.

19 Q Okay. All right. Let me show you
20 Exhibit 14.

21 (Ridlehoover Deposition Exhibit Number 14
22 marked for identification.)

1 BY MR. CROSS:

2 Q So, Ms. Ridlehoover, I would not
3 expect you to have seen Exhibit 14 before. It's an
4 e-mail from Frances Watson to Pamela Jones, on
5 May 11th of 2021.

6 Do you recall Frances Watson was the
7 head of the investigative unit at the Secretary's
8 office?

9 A I do not.

10 Q Okay. What I want you to look at is,
11 look behind the slip sheet. There's an e-mail here
12 from James Barnes, this is May 7 of 2021, so the --
13 the election supervisor in Coffee County. And he
14 sends this e-mail to Chris Harvey of the Secretary
15 of State's Office.

16 Do you see that?

17 A Yes.

18 Q Do you remember the name Chris
19 Harvey?

20 A Yes.

21 Q And do you recall that Chris Harvey
22 was the State Election Director?

1 A Yes. Yes.

2 Q And the subject line of Mr. Barnes'
3 e-mail says, "Coffee County," and then there's an
4 attachment entitled, "Cyber Ninja."

5 Do you see that?

6 A Yes.

7 Q Mr. Barnes wrote to Chris Harvey on
8 May 7 of 2021, and he says that, "The Dominion
9 e-mail today pertaining to cyber ninjas was
10 alarming to me. When I took over the Coffee County
11 office, the attached business card was at the base
12 of Misty Hayes' computer monitor. I thought
13 nothing of it until I heard about the situation in
14 Arizona with the DoJ. If she did not use them, she
15 was at the very least in contact."

16 Do you see that?

17 A Yes.

18 Q And Misty Hayes is another name for
19 Misty Hampton?

20 A Yes.

21 Q Okay. So you see that Mr. Barnes
22 reported to Chris Harvey on May 7, 2021, that he

1 found sitting next to Ms. Hampton's computer a card
2 from Cyber Ninja.

3 Are you with me?

4 A Yes.

5 Q Okay. So flip to the last page.

6 This is a copy of the card that Mr. Barnes sent
7 Chris Harvey. Do you recall ever seeing that card
8 in the office?

9 A No.

10 Q Do you recall anybody coming in while
11 you were there and -- and mentioning Cyber Ninjas?

12 A No.

13 Q Does this refresh your recollection
14 at all that Doug Logan, or someone from Cyber
15 Ninjas, came into the office?

16 A No.

17 Q Do you have any information at all
18 about why that card was in Ms. Hampton's office?

19 MR. DELK: Object to the form.

20 THE WITNESS: No.

21 BY MR. CROSS:

22 Q Okay. All right. Let me hand you

1 Exhibit 15.

2 (Ridlehoover Deposition Exhibit Number 15
3 marked for identification.)

4 BY MR. CROSS:

5 Q And you can take a moment to flip
6 through it, but it's -- it's two memos, and then
7 there's a third page, it's got a table attached to
8 it with some handwritten notes.

9 And just looking at the cover page
10 first for Exhibit 15, you see it says, "Memo to
11 Coffee County Election Supervisor from Center for
12 Election Systems."

13 A Uh-huh.

14 Q Yes?

15 A Yes.

16 Q Okay.

17 A Sorry.

18 Q That's okay.

19 And the Center for Election Systems,
20 that's at the state level, right?

21 A I -- yes, I'm assuming -- yes, I
22 guess.

1 MR. DELK: Don't assume.

2 MR. CROSS: Don't guess.

3 MR. DELK: If you know, you know.

4 THE WITNESS: I mean, I do not know.

5 BY MR. CROSS:

6 Q Okay. Let me ask you this: Have you
7 ever heard of the Georgia Center for Election
8 Systems?

9 A Vaguely.

10 Q Okay. Have you ever heard it
11 referred to as "CES"?

12 A No.

13 Q Okay. If you look at this, in the
14 middle it says, "Upon receiving the secured red bag
15 containing the USB drive holding the January 5th
16 General Election Runoff for the US Senate and
17 Public Service Commission and any local races, if
18 applicable; please contact CES to obtain the
19 password to access the USB drive."

20 Do you see that?

21 A Yes.

22 Q Have you ever seen a memo like this

1 before when you were in the County Election Office?

2 A Yes.

3 Q To take a step back for a moment.

4 When you guys would run an election in Coffee
5 County, leading up to that election, you would get,
6 what's referenced here, a secured red bag would
7 come delivered to the office with a flash drive in
8 it, right?

9 Some sort of device in it?

10 A Yes. Yes.

11 Q Okay. And just like laid out in
12 Exhibit 15, someone in the office would have to
13 call the State to get a password to access that
14 device?

15 A I do not know.

16 Q Okay. When that bag came in with
17 that device, did Ms. Hampton handle it?

18 A Yes.

19 Q Did you have any responsibility for
20 that?

21 A No.

22 Q So that bag would go to Ms. Hampton

1 and she would do what she did with it?

2 A Yes.

3 Q If you look at the -- further down on
4 the memo, do you see it says, "EED User Name"?

5 A Yes.

6 Q Do you know what that refers to?

7 A I do not.

8 Q Have you ever heard of something
9 called the "Election Event Designer"?

10 A No.

11 Q Have you ever heard of "Election
12 Project Files"?

13 A No.

14 Q If you look down, do you see where it
15 says, "RTR User Name" and "RTR Password"?

16 A Yes.

17 Q Have you heard of something called
18 "Results Tally and Reporting"?

19 A No.

20 Q And then if you look further down, do
21 you see where it says, "Technician/Poll
22 Worker/Security Key Tab"?

1 A Yes.

2 Q Do you know what that refers to?

3 A Yes.

4 Q What does that refer to?

5 A That is the number I would key in to
6 open and close the machines at the end of the day
7 or the beginning of the day.

8 Q And the machines, you mean what you
9 call the touchscreens?

10 A Yes. Sorry.

11 Q And when you say you would use that
12 to open and close the beginning and end of the day,
13 just walk me through what you did.

14 A We walked in. Everybody got there
15 around 8:15. You walked in. I took the -- the
16 security code key, the card, I put it in. Type in
17 the little number, open, pull it out. Move to the
18 next one.

19 Q This is for an election?

20 A Advanced voting.

21 Q Right.

22 A Advanced voting.

1 Q So for the -- as I understand what
2 you said before, for advanced voting, a Dominion
3 tech would come and take the touchscreens out of
4 the vault?

5 A Yes.

6 Q And then you would -- you would help
7 set those up?

8 A No.

9 Q He would set those up?

10 A Yes.

11 Q So he would physically set them up in
12 the early voting room?

13 A Yes.

14 Q So then at some point you would enter
15 a key, like the one in Exhibit 15, to activate
16 them?

17 A On start of advanced voting, first
18 day, yes.

19 Q So you would start advanced voting,
20 you would go into each of the machines the Dominion
21 tech had set up in that room, enter this key to
22 activate the touchscreen machines?

1 A Correct.

2 Q And did you use that key also to shut
3 them down?

4 A Yes.

5 Q Did you do that at the end of each
6 day of advanced voting?

7 A Yes.

8 Q So each day of advanced voting, you
9 would have to enter a key to activate them, and
10 then you entered that same key at the end of the
11 day to deactivate them?

12 A Correct.

13 Q Okay. And that was -- that was your
14 responsibility?

15 A Correct.

16 Q And looking at this, do I understand
17 right, it was the same key for each touchscreen?

18 A For each election, yes.

19 Q So every election, you'd get -- you'd
20 get a new key to activate the touchscreens just for
21 that election?

22 A Correct.

1 Q And it would be the same key for all
2 the touchscreens?

3 A Correct.

4 Q And that key would come in from the
5 State?

6 Let me just ask a better question.
7 Where did that key come from?

8 A I do not.

9 Q Who gave it to you?

10 A Misty.

11 Q So Ms. Hampton got the key from
12 somewhere and you don't know where?

13 A The code, not -- the code.

14 Q The -- yeah, what we're calling the
15 key here, this code --

16 A Yes.

17 Q -- to do that?

18 A Yes.

19 Q Okay. Could you describe for me the
20 steps to enter that code?

21 What are you entering it on?

22 So I'm trying to understand the

1 mechanics of it, right?

2 So you -- you walk into the early
3 voting room, Dominion tech has all the machines set
4 up?

5 A Correct.

6 Q And you walk up to one of these
7 touchscreens?

8 A Correct.

9 Q And you're going to enter a code like
10 we have in Exhibit 15?

11 A Correct.

12 Q Where do you enter it?

13 A It showed a little keypad. Once you
14 put that credit card key thing in, it showed up as
15 a little keypad, just like a little -- like an ATM
16 keypad.

17 Q These were physical buttons, not a
18 touchscreen?

19 A No, it was a touchscreen.

20 Q Touchscreen.

21 Was it on the same touchscreen where
22 the voters would vote?

1 A Yes.

2 Q So you had -- you had one of these
3 memory cards, kind of looks like a credit card?

4 A Yes.

5 Q You would slide that into a slot on
6 the touchscreen?

7 A Correct.

8 Q And the touchscreen would come alive
9 with a keypad on it?

10 A Correct.

11 Q Nine-digit keypad or ten-digit or
12 what?

13 A Oh, one digit -- it was one through
14 zero, yeah.

15 Q So one through nine and then zero?

16 A Zero, yes.

17 Q Any other options?

18 A I honestly don't remember.

19 Q You would enter the code and that
20 would activate the machine?

21 A Correct.

22 Q Okay. And that was the same process

1 and same key code for each machine for a given
2 election?

3 A Correct.

4 Q The next one we see here in Exhibit
5 15, it refers to -- I'm sorry, you can stay on the
6 same page.

7 A Okay.

8 Q -- "ICP30/ICC and ICP Supervisor."
9 Do you see that?

10 A Yes.

11 Q And there's a six-digit code. Do you
12 see that?

13 A Yes.

14 Q Do you know what that refers to?

15 A Refresh me, what is an ICC?

16 MR. DELK: If you don't know -- I
17 think that's what he's asking. If you know it --

18 THE WITNESS: I do not know.

19 BY MR. CROSS:

20 Q So there's a central scanner in the
21 office, right?

22 There's a scanner in your -- that's

1 out in the GEMS room, correct?

2 A Correct.

3 Q And have you ever heard of that
4 referred to as the ICC?

5 A Yes.

6 Q Okay. Does that help you -- an ICP,
7 there are also individual scanners in the early
8 voting room, right?

9 A Yes.

10 Q And there were individual scanners
11 that would go out with the touchscreens to
12 precincts, right?

13 A Yes.

14 Q Do you recall those being referred to
15 as ICPs?

16 A Is that the black trashcan?

17 Q If you don't know, just say, "I don't
18 know."

19 A I don't know.

20 Q The black trashcan, what you got for
21 the black trashcan would be an individual
22 scanner --

1 A Uh-huh.

2 Q -- right?

3 It's a scanner that sits --

4 A Yes.

5 Q -- on top and the ballot falls into
6 the bin?

7 A Yes.

8 Q Did you ever hear that called an ICP?

9 A No.

10 Q Okay. So just looking at this, do
11 you know what the code here was used for?

12 A I do not.

13 Q Okay. The -- and sorry, you may have
14 said this. Where it indicates that the secured red
15 bag comes in and there's a password that has to be
16 obtained, did I understand right, Ms. Hampton would
17 handle that, to your knowledge?

18 A Right.

19 Q Okay. All right. Let's -- let's go
20 back to January 7 of 2021. Did you see anyone
21 scanning ballots that day?

22 A I do not remember.

1 Q Do you recall Misty Hampton scanning
2 ballots after that team left for a period of days
3 or weeks?

4 A I do not remember.

5 Q Do you recall a scanner sitting in
6 that office that wasn't -- it wasn't a traditional
7 scanner you had there, it wasn't a Dominion
8 scanner, it was a scanner somebody brought in and
9 Ms. Hampton was using it to scan ballots?

10 A I do not remember.

11 Q Where were the ballots kept in the
12 office after an election?

13 A It was a little black case like
14 yay -- yay big.

15 Q And where was that case kept?

16 A In the vault.

17 Q On January 7, when that team came in,
18 do you recall that they went into the vault for
19 some period?

20 A I do not.

21 Q So all you recall is seeing them come
22 in, go into Ms. Hampton's office, you don't recall

1 where else they went?

2 A I do not.

3 Q I'm going to hand you what's been
4 marked as Exhibit 16.

5 Wait. I need one of those back.

6 Thank you.

7 (Ridlehoover Deposition Exhibit Number 16
8 marked for identification.)

9 BY MR. CROSS:

10 Q And so, Ms. Ridlehoover, what I have
11 handed you here is a string of text messages
12 between Eric Chaney and Misty Hampton. Okay?

13 A Okay.

14 Q If you'll flip -- if you look at the
15 bottom right corner, you'll see where it says page
16 number --

17 A Uh-huh.

18 Q -- of 24.

19 A Yes.

20 Q Flip to, please, page 22 of 24. If
21 you look down at the bottom -- well, actually look
22 in the middle. Do you see there's a date,

1 January 6, 2021 at 4:26 p.m.?

2 A Yes.

3 Q And here we have a text that Misty
4 Hampton sends to Eric Chaney that reads, "Scott
5 Hall is on the phone with Cathy, but wanting to
6 come scan our ballots from the general election
7 that we talked about the other day. I'm going to
8 call you in a few."

9 Do you see that?

10 A Yes.

11 Q Does that refresh your recollection
12 at all that Scott hall came into the Elections
13 Office on or around January 7th of 2021?

14 MR. DELK: Object to the form.

15 THE WITNESS: I don't know who came
16 in the office.

17 BY MR. CROSS:

18 Q Does it refresh your recollection at
19 all that individuals -- one or more individuals
20 were scanning ballots in the office on or around
21 January 7 of 2021?

22 A I do not recall anybody scanning a

1 ballot.

2 Q Okay. Then if you come further down,
3 do you see the date, January 7, 2021, at 10:18
4 a.m.?

5 A Yes.

6 Q And here Ms. Hampton writes to
7 Mr. Chaney, "Hey, are you coming into the office?
8 I'll need a board member to be here when we
9 transfer ballots."

10 Do you see that?

11 A Yes.

12 Q Do you see Mr. Hampton -- I'm sorry,
13 Mr. Chaney responds, "I'll be there at 11:00"?

14 A Yes.

15 MR. DELK: Object to the form.

16 THE WITNESS: Uh-huh.

17 BY MR. CROSS:

18 Q Does that refresh your recollection
19 that Mr. Chaney was in the office for some portion
20 of January 7 of 2021?

21 A No.

22 Q You just don't remember?

1 A I do not.

2 Q If you look at the top of the next,
3 do you see still on January 7, 2021, at 7:24 p.m.
4 Do you see that?

5 A Yes.

6 Q Mr. Chaney sends a text to
7 Ms. Hampton with a phone number, an 864 number. Do
8 you see that?

9 A Yes.

10 Q Do you recognize that number?

11 A No.

12 Q Have you ever heard the name Robert
13 Sinners, S-I-N-N-E-R-S?

14 A No.

15 Q If you come further down that same
16 page, do you see there's a date in the middle,
17 January 19, 2021, at 10:35 a.m.?

18 A Yes.

19 Q And you see Ms. Hampton sends a text
20 to Eric Chaney that says, "If you happen to be in
21 town, the guys measuring my desk are still here."

22 Do you see that?

1 A Yes.

2 Q Were you aware that that was a code
3 that Ms. Hampton and Mr. Chaney worked out to refer
4 to individuals who are accessing the voting
5 equipment that day?

6 A No.

7 MR. DELK: Object to the form.

8 BY MR. CROSS:

9 Q Fair to say you didn't see anyone in
10 the office on January 19th with a tape measure
11 measuring her desk, right?

12 A I do not recall.

13 Q Sorry, just a few more questions on
14 this.

15 Turn to page 12 of 24 if you would,
16 please. All right. Sorry, turn to page 15.

17 A What now?

18 Q Page 15 of 24. If you look down at
19 the bottom, it's kind of hard to see, but it's a --
20 it's a screenshot from Amazon for the purchase of a
21 digital voice recorder.

22 Do you see that?

1 A I see the picture, but I cannot see
2 what it is.

3 Q I had to take a picture and zoom in
4 on my phone. It's hard to see.

5 Did you guys record board meetings,
6 audio record?

7 A They did, but it was on an -- a
8 dinosaur, the old-timey, you press play and record,
9 you flip the tape over when it cuts off. That's
10 what they recorded it on.

11 Q The -- you're talking an old cassette
12 tape recordings?

13 A Yes, correct.

14 Q Were you aware at some point they
15 switched to a digital voice recorder?

16 A Not that I'm aware of.

17 Q Who maintained the recordings of
18 those meetings?

19 A Misty.

20 Q Ms. Hampton did?

21 A Yes.

22 Q And do you know where they were kept?

1 A Just that -- I mean, just -- a box,
2 because really, she never went -- she took notes on
3 her paper of what happened at the board member
4 meeting. I mean, if there was a question, they
5 would go back and play the tape, but other than
6 that, to my knowledge, it was the same tape over
7 and over every month.

8 Q So they would record the meetings and
9 then she would keep the tape recorder and tape
10 somewhere in her office, as far as you know?

11 A I do not remember.

12 MR. DELK: Object to the form.

13 BY MR. CROSS:

14 Q When the meeting ended, who took the
15 tape recorder, she did or someone else?

16 A Misty did.

17 Q Do you remember where she took it?

18 A I do not.

19 Q All right. Flip to page 13, if you
20 would. Do you see the text in the middle of the
21 page dated 11/13/2020 at 2:25 p.m.?

22 A Yes.

1 Q And you see that there's a photo of a
2 ballot that's got two QR codes on it?

3 A Yes.

4 Q Do you recall from time to time that
5 the Dominion system would generate -- it would
6 print a ballot that had more than one QR code?

7 A I do not.

8 Q That's not something you recall
9 talking to Ms. Hampton about?

10 A I honestly do not remember.

11 Q Okay. Then further down there's a
12 picture of a ballot where Ms. Hampton indicates, if
13 you look below, it says, "Look at this one, only
14 printed a few races."

15 Do you see that?

16 A Yes.

17 Q Do you recall incidents where the
18 Dominion system, the ballot would be printed for
19 the voter, it would be missing some of the
20 elections that they had voted in?

21 A I do not remember.

22 Q Okay. Do you recall -- strike that.

1 Did you ever discuss with Ms. Hampton
2 or her daughter about the ability to watch Netflix
3 on the poll pads?

4 A I do not remember.

5 Q You don't remember her daughter
6 saying that she could access Netflix on the poll
7 pads on the election day?

8 A I don't remember.

9 Q Okay. Flip to page 19, if you would,
10 please.

11 A Nineteen?

12 Q Yes, ma'am.

13 If you look at the top, you'll see
14 there's a date of September 30th, 2020. Do you see
15 that --

16 A Yes.

17 Q -- at 4:00 p.m.?

18 And do you see there's three pictures
19 here and those pictures are pictures of poll pads,
20 right?

21 A Correct.

22 Q And you've seen the poll pads

1 yourself before?

2 A Correct.

3 Q Did you ever use a poll pad?

4 A Yes. In advanced voting, like during
5 lunch.

6 Q Okay. And what -- what was your
7 responsibility with respect to poll pads?

8 A To create a card if somebody went to
9 lunch.

10 Q Okay. Do you see on the top one on
11 the screen there, it's Netflix on the poll pad
12 screen?

13 A Yes.

14 Q Does that refresh your recollection
15 that the poll pads can access the internet,
16 including Netflix?

17 MR. DELK: Object to the form.

18 THE WITNESS: No, I do not remember.

19 BY MR. CROSS:

20 Q Okay. After the board meeting where
21 you were let go, did you ever return to the Coffee
22 County Election Office?

1 A To vote --

2 Q Okay.

3 A -- this past time.

4 Q Did you ever return for any other
5 reason?

6 A No.

7 Q So, for example, did you go -- did
8 they let you go back to get personal belongings?

9 A Oh, yes. Yes, that day. But it was
10 that day.

11 Q Did you go immediately from the board
12 meeting?

13 A Yes.

14 Q Did anyone go with you?

15 A Fred Cole, which is a deputy. And I
16 think that's it.

17 Q Did he follow you there in his car or
18 you rode with him?

19 A We walked across the street.

20 Q Oh, it's close by.

21 A Yes.

22 Q And he walked in with you?

1 A Yes.

2 Q And did he escort you, like, to your
3 desk?

4 A I don't remember all that. I mean,
5 it was me and Misty both.

6 Q So you and Ms. Hampton left the
7 courthouse after the meetings and Sheriff -- Deputy
8 Sheriff -- what is he?

9 A Chief deputy or whatever it is.

10 Q Cole?

11 A Yes, Cole.

12 Q -- he escorted you back into the
13 Coffee County Election Office to gather personal
14 belongings?

15 A Correct.

16 Q Do you remember about how long you
17 guys were in that office?

18 A I don't.

19 Q Would you say minutes or hours?

20 A It wasn't hours.

21 Q Okay. Was it one hour?

22 A I honestly don't remember. I mean, I

1 do not remember.

2 Q And where was Ms. Hampton while you
3 were in the office at that time?

4 A In her office.

5 Q And did you guys talk at all while
6 you were in that office?

7 A I do not remember.

8 Q Could you see what she was doing in
9 her office?

10 A No.

11 Q Do you know whether she went into the
12 GEMS room at that time?

13 A I do not.

14 Q Did you?

15 A No.

16 Q I think you said earlier, have you
17 ever logged into the -- the server in the GEMS
18 room?

19 A No.

20 Q Did you ever know what the password
21 was?

22 A No.

1 Q Did you ever hear of anyone changing
2 that password?

3 A No.

4 Q Do you know if you or Ms. Hampton had
5 the ability to change that password on the
6 computer?

7 A I do not.

8 Q Do you have any information on why
9 the password on the server computer would have
10 stopped working at any point after you guys left?

11 A I do not.

12 Q Did you ever hear that the password
13 on the server computer stopped working while you
14 were still there?

15 A I did not.

16 Q The people who came in on the 7th, do
17 you recall if any of them were black or white?

18 A I do not remember.

19 Q Was any of them black or were they
20 all white?

21 A I don't think so, no.

22 Q Okay. So the best of your

1 recollection, everyone who came in that -- that day
2 on that team was white?

3 A Correct.

4 Q Do you remember whether any of them
5 had facial hair?

6 A I do not.

7 Q Do you remember hair color?

8 A I do not.

9 Q Do you remember if any of them was
10 tall or short?

11 A I do not.

12 Q Did you speak with any of them?

13 A No, I did not.

14 Q Other than your counsel, did you
15 speak to anyone about your deposition today?

16 A No, I did not.

17 Q Did you speak to Mr. Chaney?

18 A No, I did not.

19 Q Have you spoken to Mr. Chaney, Eric
20 Chaney, at all about your time in the Elections
21 Office since you left that office?

22 A No, we did not.

1 Q Never talked about it?

2 A We do not.

3 Q Why is that?

4 MR. DELK: Object to the form.

5 THE WITNESS: No need to.

6 BY MR. CROSS:

7 Q In the time that you were in the
8 Coffee County Election Office, did anyone from the
9 State ever contact you about this team that came in
10 on the 7th?

11 A No.

12 Q Did anyone from the State ever --
13 strike that.

14 Since you left the office, has anyone
15 from the State ever contacted you about whether
16 anyone had access to the Coffee County Election
17 Office that shouldn't have?

18 MR. DELK: Object to the form.

19 You can answer.

20 THE WITNESS: No.

21 BY MR. CROSS:

22 Q Has anyone from the State ever

1 contacted you about, at any time, individuals who
2 may have come into the office on or around
3 January 7th of 2021?

4 A No.

5 Q Has anyone from the State ever
6 contacted you about any State investigation related
7 to Coffee County Elections?

8 A No.

9 Q Has anyone from the FBI?

10 A No.

11 Q Has anyone ever suggested to you that
12 you might face criminal charges for any conduct
13 while you were in the Coffee County Elections
14 Office?

15 MR. DELK: She answered no.

16 THE WITNESS: No.

17 BY MR. CROSS:

18 Q Do you have any reason to believe
19 that you personally committed any crime during your
20 time in the Coffee County Elections Office?

21 A No.

22 MR. DELK: Object to the form.

1 MR. CROSS: All right. Let's take a
2 break.

3 MR. DELK: Sure.

4 VIDEOGRAPHER: We are going off the
5 record at 11:57.

6 (Recess from 11:57 a.m. to 12:17 p.m.)

7 VIDEOGRAPHER: We are on the record
8 at 12:17.

9 BY MR. CROSS:

10 Q All right. Almost done,
11 Ms. Ridlehoover. We appreciate your time today.

12 All right. When you worked in the
13 Coffee County Election Office, did you send e-mails
14 from your work sometimes?

15 A No.

16 Q Okay. But you had -- you had an
17 e-mail account on your computer?

18 A Yes, just -- yes.

19 Q Okay. It was an Outlook account,
20 Microsoft?

21 A I do not remember.

22 Q Okay. When you -- when you came in

1 in the morning and sat down at your computer, did
2 you log in?

3 A Yes.

4 Q So you had a user name and a
5 password?

6 A Yes.

7 Q Did you set the password?

8 A Yes.

9 Q Did the password ever change while
10 you were there?

11 A I do not remember.

12 Q Okay. So you don't remember, for
13 example, changing your password every few months or
14 every year or anything like that?

15 A No.

16 Q Did you write the password down
17 somewhere to help you keep track of it?

18 A No. I use the same password for
19 everything.

20 Q What -- what does that mean?

21 MR. DELK: Don't tell him your
22 password for the record.

1 BY MR. CROSS:

2 Q Oh, oh, oh, oh. I see. You're
3 saying the password you had for your work computer
4 was the same password you use for, like, personal
5 things?

6 A Right.

7 Q Okay. Okay. No, don't give us your
8 password.

9 All right. Is it fair to say at some
10 point when you started your job, you set a password
11 that you used for everything because it's easy to
12 remember?

13 A Correct.

14 MR. DELK: Object to the form.

15 BY MR. CROSS:

16 Q As far as you recall, that password
17 didn't change while you were there?

18 A Not that I remember.

19 Q Okay. When you would log into your
20 computer, what would you do next?

21 A Pull up E-net.

22 Q Okay. What did you do with E-net?

1 What were your responsibilities with respect to
2 E-net?

3 A Is that what it's called?

4 That's where you register somebody to
5 vote, change their address, if we got where they
6 were deceased, take them out of the system.

7 Q Got it.

8 Did you log into an e-mail account or
9 did you open e-mail once you were logged into your
10 computer?

11 A Honestly, I never used the County
12 e-mail, I just did it straight through my -- my
13 personal e-mail.

14 Q All right. And what is -- what is
15 that?

16 A Jilb26@yahoo.

17 Q Yahoo e-mail?

18 A Yes.

19 Q So you -- you would use your personal
20 e-mail account from your -- from your work
21 computer?

22 A Right.

1 Q Okay. And so you would just log-in
2 as you normally would through Yahoo?

3 A Correct.

4 Q And what did you use your e-mail for
5 with respect to work?

6 A I did not.

7 Q Okay. So you didn't send any work
8 e-mails?

9 A No.

10 Q And so -- but any e-mails that you
11 sent during the workday, you would just use your
12 Yahoo account?

13 A Correct.

14 Q So in all of the years that you were
15 there, you never had the -- you never had to e-mail
16 anyone at all about work?

17 A Maybe a time sheet issue or, you
18 know, or pay -- or, you know, "Hey, can you tell me
19 when I'm supposed to go for an insurance checkup,"
20 or, "reinstate insurance." Other than that, that's
21 it.

22 Q But even that, you would just use the

1 Yahoo e-mail?

2 A Correct.

3 Q So as you sit here, you don't recall
4 ever sitting down at your work computer and sending
5 an e-mail from a work e-mail account?

6 A I did not, not that I recall.

7 Q Okay. Do you know -- do you know
8 whether you had a work e-mail account that you
9 could use?

10 A Yes. It was through the Coffee
11 County. I don't remember what it was called, but
12 yes.

13 Q Do you recall that it was an Outlook
14 account?

15 A I do not remember.

16 Q When you left the Coffee County
17 Election Office, did you delete any e-mails?

18 A No.

19 Q Did you delete anything from your
20 work computer?

21 A No.

22 Q When you went back to the office to

1 collect your belongings, did you log into your work
2 computer?

3 A No.

4 Q When you left the office, did you
5 take anything with you other than your own personal
6 belongings?

7 A No.

8 Q Did you see Ms. Hampton take anything
9 other than her personal belongings?

10 A I did not.

11 Q Did you see her log into her
12 computer?

13 A I do not remember.

14 Q Do you know if she did?

15 A I have no clue.

16 Q Do you know if she took anything
17 beyond her personal belongings?

18 A I do not.

19 Q At any point after January 7 of 2021,
20 did you ever see anyone from Dominion come in to
21 access any of the voting equipment?

22 A After -- do what now?

1 Q To access any of the voting
2 equipment?

3 A After what?

4 Q After the -- when that team came in
5 on January 7 of 2021, did the Dominion tech that
6 worked with you guys, or anyone else from Dominion,
7 ever come in to do anything with the voting
8 equipment in the office?

9 A I do not remember.

10 Q Okay. And the Dominion tech that you
11 guys worked with, was his name James?

12 A Yes.

13 Q Okay.

14 A Yes. Yes. Yes. Okay. I couldn't
15 remember his name. Yes.

16 Q Do you remember his last name?

17 A He was not from here, he's from
18 Haiti -- Haiti.

19 Q Oh, Haiti. Okay.

20 You don't remember his last name?

21 A I do not.

22 Q Okay. And so, for example, after

1 that team came in on January 7th, did you ever see
2 James back in the office?

3 A Not that I remember, no.

4 Q Okay. Because you were -- you were
5 still there for almost two full months, you don't
6 remember him in the office at all?

7 A I don't remember. I mean, I don't.

8 Q How often did James typically come
9 into the office when you were there?

10 A Just during elections.

11 Q So he -- he wasn't around if there
12 was no election?

13 A No.

14 Q Okay. There was an election on --
15 the senate runoff was January 5th, 2021. Do you
16 remember that?

17 A Yes.

18 Q And James was around to help with
19 that, right?

20 A I honestly don't remember if it was
21 James or if it was somebody else. I do not
22 remember who.

1 Q There was a Dominion tech who came in
2 to help?

3 A Yes.

4 Q There was a Dominion tech, for
5 example, who came in and helped set up the -- the
6 voting equipment?

7 A Yes.

8 Q And so was the Dominion tech there on
9 January 6th to help break all the equipment down
10 and put it away?

11 A Was that election night?

12 Q That was the day after the election.

13 A I do not remember.

14 Q Okay. When equipment was set up for
15 an election on election day, when would it
16 typically be taken down?

17 A That same night.

18 Q Okay. So it wouldn't sit overnight?

19 A No.

20 Q And so the Dominion tech would help
21 with sort of taking it down?

22 A No. It -- that was -- goes back to

1 whoever they hired to go and set up the equipment
2 through the County on election days, you know,
3 actual election date.

4 Q But I thought you said the Dominion
5 tech would take the touchscreens out of the vault
6 for elections.

7 A To set them to do L&A, yes, correct.
8 And then he would put them back in the case and
9 then whoever the County hired --

10 Q Okay. So let me make sure I have
11 this right then. For an election, the Dominion
12 tech comes in before the election, pulls the voting
13 equipment out of the vault and does logic and
14 accuracy testing?

15 A Correct.

16 Q And was that typically James for you?

17 A We -- like, I mean I only did one
18 election, so yes.

19 Q Okay.

20 A You know, one election cycle year,
21 whatever you want to call it.

22 Q Okay. So the Dominion tech would do

1 the logic and accuracy testing. Would the Dominion
2 tech do that on all of the touchscreens?

3 A Yes.

4 Q There were some touchscreens that you
5 guys never used that just stayed in the vault and
6 you didn't need them, right?

7 A Correct.

8 Q And there's a pretty good number of
9 those that you just never used, right?

10 A I honestly don't even know how many's
11 back there.

12 Q Did he do the logic and accuracy
13 testing only on the equipment that's going to be
14 used in the election?

15 A Correct.

16 Q Okay. And so he does logic and
17 accuracy testing. Does he then put the equipment
18 back in the vault?

19 A Correct.

20 Q And so then someone -- like, was it
21 Mandy -- was the name -- who would take the
22 equipment to the precincts?

1 A Yes.

2 Q Mandy would then come in later, take
3 that equipment out of the vault, put it on this
4 trailer and take it to the precincts?

5 A Correct.

6 Q And then Mandy would bring it back
7 and put it back in the vault?

8 A Correct.

9 Q And for early voting, did the
10 Dominion tech move the voting equipment out of the
11 vault into the early voting room?

12 A Correct.

13 Q Did the Dominion tech take that
14 equipment back into the vault?

15 A Correct, just advanced voting.

16 Q And so you're saying -- and the
17 advanced voting would be shut down typically a few
18 days before the election day, right, the Friday
19 before?

20 A The Friday before, yes.

21 Q And so that equipment typically would
22 be taken down the night of the Friday before

1 election day by Dominion tech and put back into the
2 vault?

3 A No. It stayed up because you had to
4 run tallies off of it for election day.

5 Q So when was the early voting
6 equipment taken down?

7 A Election night.

8 Q Got it.

9 So election night you're taking the
10 early voting equipment, putting it back into the
11 vault, and all of the precinct equipment is also
12 going into the vault?

13 A Right. It took ample time for them
14 to come to that -- the most -- the advanced voting
15 stuff was already up and put up before any of that
16 other stuff started coming through the door.

17 Q And the Dominion tech would be the
18 one to take the early voting equipment and put it
19 back in the vault?

20 A Yes.

21 Q Okay. Was anything done with the
22 voting equipment on the day after the election or

1 it's all back in the vault?

2 A It's all put up.

3 Q Do you recall a Dominion tech in the
4 Elections Office on January 7 of 2021, when that
5 team was there?

6 A I do not.

7 Q You don't recall one way or the other
8 or your recollection is that a Dominion tech was
9 not there?

10 A I do not recall one way or another.

11 Q Have you ever heard the name John
12 Terry?

13 A No.

14 Q Do you remember a democratic
15 representative who wore a cowboy hat?

16 A I do not.

17 Q All right. Let me hand you Exhibit
18 17.

19 (Ridlehoover Deposition Exhibit Number 17
20 marked for identification.)

21 BY MR. CROSS:

22 Q And you'll see page numbers in the

1 bottom left.

2 A Yes.

3 Q Flip to page 3 if you would --
4 actually flip to page -- flip to page 6. Sorry,
5 they're not in order. If you look at page 6,
6 you'll see at the top initials "CL" and then
7 "Cathy"?

8 A Uh-huh.

9 Q Yes?

10 A Yes. Sorry.

11 Q And these are text messages between
12 Misty Hampton and Cathy Latham. Do you understand
13 that?

14 A Yes.

15 Q And at the top of -- you can see
16 there's a text message that Ms. Latham sends to
17 Misty Hampton on January 7, 2021, at 9:46 a.m.
18 "Team left Atlanta at 8. 5 members led by Paul
19 Maggio." There's a phone number. And, "Scott is
20 flying in." Ms. Hampton responds, "Yay."

21 Do you see that?

22 A Yes.

1 Q Okay. Does this refresh your
2 recollection at all that Paul Maggio was in the
3 office on January 7 of 2021?

4 A It does not.

5 Q And you see Ms. Hampton writes, "What
6 is Scott's last name?" Ms. Latham responds,
7 "Hall."

8 Do you see that?

9 A Yes.

10 Q Does that refresh your recollection
11 that Scott Hall was there that day?

12 A It does not.

13 Q Okay. And then Ms. Hampton writes,
14 "Is somebody coming at 10? To vote review panel."

15 Do you see that?

16 A Yes.

17 Q Do you recall that there was a voter
18 review panel in the office on January 7th?

19 A I do not.

20 Q You just don't recall one way or the
21 other?

22 A I don't recall.

1 Q And then if you flip now to page 3,
2 this picks up where we left off. And so we're
3 still on January 7th. So the bottom of the text
4 starts on January 6, it says, "Okay. How was it
5 today? Finished?" You'll see that picking up on
6 page 3.

7 A Yes.

8 Q So we're still on the same thread on
9 January 7th. Cathleen Latham says, "How is it
10 today? Finished?" And Ms. Hampton says, "All were
11 very simple." Ms. Scott -- Ms. Latham writes,
12 "Good. Scott has landed. The rest of the team is
13 almost to Douglas." Then Ms. Hampton writes,
14 "Okay. The democratic man is still here."

15 Do you know who the democratic man
16 is?

17 A I do not.

18 MR. DELK: Object to the form.

19 BY MR. CROSS:

20 Q And you don't -- you don't have any
21 recollection of a review panel that day?

22 A I do not remember.

1 Q And you don't recall someone being in
2 the office that day wearing a cowboy hat?

3 A I don't remember.

4 Q And you don't -- you don't recall the
5 name John Terry at all?

6 A I do not.

7 Q Is there anyone else you remember
8 being in the Coffee County Election Office at any
9 point on January 7 of 2021 that we have not talked
10 about?

11 A I have not.

12 Q Did anyone from the public happen to
13 come in that day?

14 A I don't remember.

15 Q Anyone from the Board other than Eric
16 Chaney?

17 MR. DELK: Object to the form.

18 THE WITNESS: I don't besides Cathy.

19 MR. DELK: Object to the form.

20 BY MR. CROSS:

21 Q So you don't recall, like, a voter
22 coming in with an issue?

1 A I do not.

2 Q Do you recall anyone taking notes
3 that day?

4 A I do not.

5 Q Did you speak with Ed Voyles in the
6 office that day?

7 A I do not remember.

8 Q But you recall he was there?

9 MR. DELK: Object to the form.

10 When you say that day --

11 MR. CROSS: January 7th, 2021.

12 THE WITNESS: I do not -- no, not

13 that I recall. I do not remember.

14 BY MR. CROSS:

15 Q Mr. Voyles, is it fair to say, he's a
16 social chatty guy?

17 A Yes.

18 Q Okay. If he was in the office that
19 day, you likely would have chatted with him, you
20 wouldn't have ignored him?

21 A Yes, correct.

22 MR. DELK: Object to the form.

1 BY MR. CROSS:

2 Q And you just don't recall one way or
3 the other whether he was there?

4 A I do not.

5 Q Do you recall ever seeing anyone on
6 the phone on January 7, 2021, in the Elections
7 Office or in the parking lot?

8 A I do not.

9 Q Do you recall pizza -- do you recall
10 having pizza for lunch that day?

11 A I do not.

12 Q Do you recall that Scott Hall bought
13 pizza for folks in the office that day?

14 A I do not remember.

15 Q All right. Did anyone at any point,
16 either on the 7th of January 2021 or after, ask you
17 not to say anything to anyone about what happened?

18 A No, they did not.

19 Q Have you ever used an app called
20 Signal?

21 A Do what now?

22 Q Have you ever used an app called

1 Signal?

2 A No.

3 Q Have you ever used Snapchat?

4 A Yes.

5 Q Have you ever used that with respect
6 to any -- anything to do with Coffee County
7 Elections?

8 A No.

9 Q Have you ever used Snapchat to
10 communicate with Misty Hampton?

11 A No. Snapchat's really not
12 communicating.

13 Q Well, have you ever sent anything or
14 received anything --

15 A Send a Snap, yes.

16 Q To Misty Hampton?

17 A Yes.

18 Q Related to your work at all?

19 A No.

20 Q Related to Coffee County Elections?

21 A No.

22 Q Related to any events involving the

1 office?

2 A No.

3 Q What about with Mr. Chaney, Eric
4 Chaney?

5 A No.

6 Q Did anyone from Dominion, while you
7 were in the office, ever conduct any kind of
8 inspection or audit of the voting equipment?

9 A Not that I know.

10 Q Did anyone from Dominion, did you
11 ever see them go into Ms. Hampton's office?

12 A Yes.

13 Q Did you ever see them go into the
14 GEMS room?

15 A Yes.

16 Q And what did you see them do in the
17 GEMS room?

18 A I didn't see them do anything. I
19 know they went in there, but I have no idea what
20 they did.

21 Q Are you aware of anyone ever
22 connecting any of the equipment in the GEMS room,

1 connecting that equipment to the internet?

2 A I have not.

3 Q There was Wi-Fi in the Coffee County
4 Elections Office, right?

5 A Yes.

6 Q And did you connect to that like with
7 your phone or anything?

8 A No.

9 Q Who typically used the Wi-Fi?

10 A It was just --

11 MR. DELK: Object to the form.

12 THE WITNESS: -- just our computers.

13 BY MR. CROSS:

14 Q Your -- your work computer was also
15 on?

16 A Yeah, had -- you don't need E-net.

17 Q Does your work computer work through
18 the Wi-Fi?

19 A Yes.

20 Q Okay. Was there a log-in or a
21 password to get on the Wi-Fi?

22 A There was, but it was already set up.

1 Q On the computer?

2 A Yes.

3 Q Did you ever connect any devices to
4 the Wi-Fi other than your computer?

5 A No.

6 Q Do you know if anyone else did?

7 A I do not.

8 MR. DELK: Object to the form.

9 BY MR. CROSS:?

10 Q All right. Let me show you Exhibit
11 18, please.

12 (Ridlehoover Deposition Exhibit Number 18
13 marked for identification.)

14 BY MR. CROSS:

15 Q So, Ms. Ridlehoover, this is an
16 article that was published by a writer named Jose
17 Pagliery at the Daily Beast.

18 Have you ever heard his name before?

19 A No.

20 Q Do you recall him reaching out to you
21 shortly before this article came out?

22 A I do not.

1 Q Okay. Flip to page 6 if you would.
2 Actually let's start with page 5, just to give you
3 a little more context.

4 Do you see here, if you come down to
5 the third paragraph on the bottom, do you see where
6 it refers to, "Team left Atlanta at 8. 5 members
7 led by Paul Maggio"?

8 A Yes.

9 Q And do you see this is referring to
10 that same text message from Ms. Latham to Misty
11 Hampton that we looked at earlier, right?

12 A Yes.

13 Q Okay. And then Ms. Latham indicates,
14 "I trust you all!" And then below that, the
15 article reports, "An hour later, a small
16 single-propeller plane flying in from
17 DeKalb-Peachtree Airport appeared on the horizon
18 just north of the small city, according to flight
19 records obtained by the Daily Beast. It landed at
20 11:06 a.m. at the Douglas Municipal Gene Chambers
21 Airport. A short time later, Latham checked in on
22 Hampton."

1 Do you see that?

2 A Yes.

3 Q Do you recall hearing that the team
4 that you saw in the office on January 7th, 2021,
5 that at least some of them had flown in?

6 A I did not.

7 Q If you would turn to the top, you'll
8 see Scott has -- it indicates here, "Latham wrote
9 to Ms. Hampton, Scott has landed. The rest of the
10 team is almost to Douglas."

11 Do you see that?

12 A Yes.

13 Q Then the article goes on, "Hall and
14 the team made their way to the windowless Elections
15 and Registration building. Hampton would later
16 tell the Daily Beast that Chaney and Latham were
17 there. And she recalled telling her junior
18 assistant, Jil Ridlehoover, to stay quiet."

19 Do you see that?

20 A Yes.

21 Q And, again, you -- you don't dispute
22 that Eric Chaney and Cathy Latham were in the

1 office on January 7, 2021, right?

2 MR. DELK: Object to the form. Asked
3 and answered.

4 THE WITNESS: Do what?

5 MR. DELK: You can answer.

6 THE WITNESS: I honestly do not
7 remember Eric Chaney being in the office.

8 BY MR. CROSS:

9 Q You just don't recall one way or the
10 other?

11 A I don't recall one way or the other.

12 Q Okay. And do you recall Ms. Hampton
13 telling you when these people were there to stay
14 quiet the whole time?

15 A Yes.

16 Q Okay. And so Ms. Hampton reports
17 here, "I told you, you sit over there, you don't
18 say anything. You don't know what's going on."

19 Do you recall her saying that to you?

20 A Correct.

21 Q Okay. And did you -- did you ask her
22 why?

1 A No, I did not.

2 Q Do you recall anything that you said
3 to Ms. Hampton after she told you not to say
4 anything?

5 A No, I don't.

6 Q Okay. Did the people being there
7 that you -- that we've talked about particularly
8 after Ms. Hampton told you to be quiet, did it
9 raise any concerns for you, any red flags? Just
10 yes or no.

11 A Yes, it did.

12 Q Did you ever speak with anyone --
13 strike that.

14 Did you ever speak with anyone about
15 this team coming in on January 7th of 2021, besides
16 the conversation where Ms. Hampton asked you to be
17 quiet?

18 A No.

19 Q So you recall ever telling anyone at
20 all that these people had come into the office?

21 A No.

22 Q So not a family member? Not law

1 enforcement? Not anyone?

2 A No.

3 MR. DELK: Objection. Asked and
4 answered.

5 BY MR. CROSS:

6 Q Do you know the name Mike Lindell?

7 A No.

8 Q Do you know the company called My
9 Pillow?

10 A What now?

11 Q Do you know the company My Pillow?
12 They sell pillows.

13 A No.

14 Q Never heard of them?

15 A No.

16 Q Do you know whether someone named
17 Mike Lindell was ever in the Coffee County
18 Elections Office?

19 A I do not.

20 Q Were you aware that he flew into
21 Douglas, Georgia on February 25th of 2021?

22 A I am not.

1 Q That's not something you ever heard
2 or talked about with anyone?

3 A No.

4 Q So when you went -- when you went
5 back to the office on February 25th, after your --
6 the meeting with the board where you were let go,
7 do you recall seeing anyone in that office besides
8 Ms. Hampton and the sheriff's deputy who went with
9 you?

10 A Princess came over there for us to
11 sign because -- yeah, Princess Porter came over
12 there for us to sign -- not to sign, but to make
13 sure she got our keys and all that.

14 Q Who was that?

15 A She is -- I don't know what she is.
16 She works at the courthouse in the Commissioners
17 Office. I don't know what her title is.

18 Q Did she walk in with you or she came
19 later there?

20 A I don't remember.

21 Q She came in, what was the
22 conversation with her? What do you remember?

1 A There wasn't one.

2 Q She came in and said, "I've got to
3 take all your" --

4 A Keys and -- yeah.

5 Q Okay. And then she left, or was she
6 still there when you left?

7 A I think I left -- I think we left
8 first and she was still there to my guess.

9 Q So on February 25th, at some point
10 during the day, you, Ms. Hampton, Ms. Porter, and
11 this Sheriff's Deputy Cole were in the office?

12 A Correct.

13 Q Was there anyone else in the office
14 who you saw that day?

15 A Not that I remember.

16 Q Okay. So we know that Mr. Lindell
17 flew into Douglas on the same day that you were let
18 go, but you don't know one way or the other whether
19 he was ever in that office?

20 A I do not.

21 Q Have you ever heard whether he has
22 ever spoken with anyone on the Board?

1 A I have not.

2 Q Mr. Chaney has never mentioned
3 Mr. Lindell?

4 A No.

5 Q Did anyone who was there on
6 January 7th, 2021 give you anything?

7 A No.

8 Q Did they hand you anything?

9 A No.

10 Q Did they ask you to take anything or
11 hide anything?

12 A No.

13 Q Did they offer you any money?

14 A No.

15 Q Offer you anything of value?

16 A No.

17 Q Did you know if anyone offered
18 Ms. Hampton anything of value?

19 MR. DELK: Object to the form.

20 THE WITNESS: I do not. You would
21 have to ask her.

22

1 BY MR. CROSS:

2 Q Did you ever see anyone hand anything
3 to Ms. Hampton in the office that day?

4 A No.

5 Q Are you familiar with the First
6 Baptist Church of Douglas?

7 A Yes.

8 Q Is that -- is that a church you
9 attend?

10 A No.

11 Q Have you ever been to that church?

12 A My son went to preschool there.

13 Q Have you been to that church at any
14 point in 2021?

15 A No.

16 Q And that's -- that's on North Gaskin
17 Avenue, right? Does that sound right?

18 A I have no clue.

19 Q Okay. And are you aware that Cathy
20 Latham is the secretary of that church?

21 A No, I was not.

22 Q Were you aware that Matthew

1 McCullough who's on the board is the CFO of that
2 church?

3 A No, I was not.

4 Q Were you aware that a scanner was
5 taken from that church to scan ballots in the
6 Coffee County Election Office in January of 2021?

7 A No, I was not.

8 Q No one asked you to go pick that
9 scanner up?

10 A No.

11 Q No one asked you to go take that
12 scanner back?

13 A No.

14 Q Do you know someone named Eddie
15 Chaney?

16 A I do not.

17 Q He works at -- well, do you know
18 David's Auto Sales?

19 A I know where it's at, but that's it.

20 Q Is that also owned by the Chaney
21 family?

22 A No, it's not.

1 Q So you don't know someone named Eddie
2 Chaney who works at -- here and at some point
3 worked at David's Auto Sales?

4 A I do not.

5 Q Never heard Eric Chaney mention him?

6 A I have not.

7 Q Okay. Did you see anyone at the
8 Coffee County Elections Office on January 7th, 2021
9 by the name of Eddie?

10 A I did not.

11 Q Did you ever hear that anyone named
12 Eddie was going to be at the office or in the
13 parking lot that day?

14 A I did not.

15 Q Did you ever hear that anyone named
16 Eddie was going to drive anyone to or from the
17 office that day?

18 A I have not.

19 Q Do you know where Eric Chaney lives?

20 A Yes.

21 Q Where is that?

22 A Mallard Pointe.

1 Q I'm sorry, where is Mallard Pointe?

2 A Well, you go out 158 and turn
3 where -- turn by the church and he lives just in a
4 little neighborhood back in there.

5 Q Have you ever been to his home?

6 A No.

7 Q How long has he lived there?

8 A I do not know.

9 Q Is it fair to say more than a month?

10 A Yeah.

11 MR. DELK: Object to the form.

12 BY MR. CROSS:

13 Q More than six months?

14 A I'm not sure.

15 Q More than two months?

16 A I have no clue.

17 Q Okay. Do you know where he lived
18 before that?

19 A I did not.

20 Q Do you ever socialize with Eric
21 Chaney?

22 A No, not outside the office.

1 Q Has Mr. Chaney ever told you to be
2 quiet about what you saw in the office on
3 January 7th?

4 A No, he has not.

5 Q And your testimony is you -- the two
6 of you have never spoken about it?

7 A No.

8 Q Did you know he resigned from the
9 Board on Friday?

10 A No, I did not.

11 Q You have not spoken to him about
12 that?

13 A No, I have not.

14 Q Sorry, I can't remember if I asked
15 you this before. With respect to the Coffee County
16 Board letting you go, did you ever consider whether
17 the real reason for that had anything to do with
18 the events of January 7 and this team that came in?

19 MR. DELK: Object to the form.

20 THE WITNESS: Honestly, I've never
21 thought about it.

22

1 BY MR. CROSS:

2 Q So the Coffee County Board forced you
3 to resign for something that you didn't do and you
4 never thought about why they did that?

5 MR. DELK: Object to the form. Asked
6 and answered.

7 THE WITNESS: I didn't --

8 MR. DELK: You can answer it subject
9 to my objection.

10 THE WITNESS: Honestly no.

11 BY MR. CROSS:

12 Q Do you have -- is there any
13 explanation that comes to mind for why Misty
14 Hampton and Cathy Latham were talking about needing
15 to get a borrowed scanner back somewhere on or
16 around January 7th, 2021?

17 MR. DELK: Object to the form.

18 THE WITNESS: You would have to ask
19 them.

20 BY MR. CROSS:

21 Q You don't recall seeing a scanner in
22 the office that day? You just don't remember one

1 way or the other?

2 A I do not.

3 Q So you don't -- nothing comes to mind
4 as to why they would have been talking about a
5 borrowed scanner?

6 A No.

7 Q Oh, I'm sorry.

8 Did the Board meet in January of
9 2021?

10 A Yes. They would have had to -- they
11 met the first -- they met the first week of every
12 month.

13 Q You don't have any reason, as you sit
14 here, to think they did not have the regular
15 meeting in January, right?

16 A I do not.

17 Q Did -- do you have any reason to
18 think they didn't meet in February?

19 A I do not remember, but I mean, like I
20 said, they met the first week of every month.

21 Q Do you have any -- is there any
22 explanation that comes to mind why there would be

1 no board meeting minutes from February of 2021?

2 A No.

3 MR. CROSS: I don't have any further
4 questions for you, Ms. Ridlehoover. I appreciate
5 your time today.

6 Bruce, do you have questions?

7 MR. BROWN: I do not have any
8 questions.

9 MR. PICO PRATS: I'll have very few
10 questions.

11 EXAMINATION BY COUNSEL FOR STATE OF GEORGIA
12 BY MR. PICO PRATS:

13 Q Ms. Ridlehoover, I'm Javier Pico
14 Prats, representing the State of Georgia, the State
15 Defendants in this case.

16 MR. CROSS: Felicia, can you hear
17 Javier okay?

18 COURT REPORTER: I can hear him fine.

19 MR. CROSS: Okay.

20 BY MR. PICO PRATS:

21 Q Do you know who the plaintiffs are in
22 the case that are sitting before you now?

1 A I do not.

2 Q And I'm just going to go through a
3 few people that are a part of this Zoom.

4 Do you know who Donna Curling is?

5 A I do not.

6 Q Do you know who Marilyn Marks is?

7 A I do not.

8 Q Have you ever met or did you know who
9 David Cross was before?

10 A Who?

11 Q David Cross.

12 A I did not, no.

13 Q Adam Sparks?

14 A No.

15 Q Russ Abney?

16 A No.

17 Q Okay.

18 MR. BROWN: I have a -- I just have a
19 question. This is Bruce Brown.

20 Are these being asked on behalf of
21 Defendant State Election Board or just the
22 Secretary of State or both?

1 MR. PICO PRATS: These are being
2 asked in -- in terms of the State defendants
3 generally.

4 MR. BROWN: Both? You're asking
5 questions about the plaintiffs on behalf of the
6 State Election Board. Is that right?

7 MR. PICO PRATS: Just the State
8 defendants.

9 MR. BROWN: Which includes which?

10 MR. PICO PRATS: That -- that
11 encompasses both.

12 MR. BROWN: Okay. Thank you very
13 much.

14 MR. PICO PRATS: That's all the
15 questions I have. Thank you.

16 THE WITNESS: You're welcome.

17 VIDEOGRAPHER: We're done?

18 MR. CROSS: We're done. We can go
19 off the record.

20 Thank you, Ms. Riddlehoover.

21 THE WITNESS: Thank you.

22 VIDEOGRAPHER: We are going off the

1 record at 12:55.

2 MR. DELK: We'll reserve signature.

3 (Whereupon, at 12:55 p.m., the
4 video-recorded deposition of JIL
5 RIDLEHOOVER was concluded; signature
6 reserved.)

CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom a partial segment of the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was not duly sworn by me, but by LeShaundra Byrd; that the testimony of said witness was taken by LeShaundra Byrd and me in stenotype and thereafter reduced to typewriting under my direction; that said deposition of the partial segment wherein LeShaundra Byrd was present (pages 6 through 45) in which I transcribed and the partial segment wherein I was present is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the



FELICIA A. NEWLAND, CSR

1 Stephen Delk, Esquire

2 sdelk@hallboothsmith.com

3 August 22, 2022

4 RE: Curling, Donna v. Raffensperger, Brad

5 8/16/2022, Jil Riddlehoover (#5375770)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-midatlantic@veritext.com

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

1 Curling, Donna v. Raffensperger, Brad

2 Jil Riddlehoover (#5375770)

3 E R R A T A S H E E T

4 PAGE_____ LINE_____ CHANGE_____

5 _____

6 REASON_____

7 PAGE_____ LINE_____ CHANGE_____

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9 REASON_____

10 PAGE_____ LINE_____ CHANGE_____

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18 REASON_____

19 PAGE_____ LINE_____ CHANGE_____

20 _____

21 REASON_____

22 _____

23 _____

24 Jil Riddlehoover

Date

25

1 Curling, Donna v. Raffensperger, Brad

2 Jil Riddlehoover (#5375770)

3 ACKNOWLEDGEMENT OF DEPONENT

4 I, Jil Riddlehoover, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

10
11 _____
12 Jil Riddlehoover

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS

15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
20
21
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24
25

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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